

1

2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3 -----x

4 FERNANDO HERNANDEZ, KENNETH CHOW,
5 BRYANT WHITE, DAVID WILLIAMS, MARQUIS ACKLIN,
6 CECILIA JACKSON, TERESA JACKSON,
MICHAEL LATTIMORE, and JUANY GUZMAN, Each
Individually, And On Behalf Of All Other
Persons Similarly Situated,

7 Plaintiffs,

8 -against- Index No:
12 CV 4339 (ALC) (JLC)

9

10 THE FRESH DIET, INC., LATE NIGHT EXPRESS
11 COURIER SERVICES, INC. (FL), FRESH DIET EXPRESS
12 CORP. (NY), THE FRESH DIET - NY INC. (NY),
13 FRESH DIET GRAB & GO, INC. (FL) a/k/a
YS CATERING HOLDINGS, INC. (FL) d/b/a
YS CATERING, INC. (FL), FRESH DIET EXPRESS
CORP. (FL), SYED HUSSAIN, Individually,
14 JUDAH SCHLOSS, Individually, and ZAIMI DUCHMAN,
Individually,

15 Defendants.

16 -----x

17

18 EXAMINATION BEFORE TRIAL of
19 the Plaintiff, TERESA JACKSON, taken by the
20 Defendant, pursuant to Notice, held at the
21 offices of Kaufman, Dolowich, Voluck & Gonzo
22 LLP, 100 William Street, Suite 215, New York,
23 New York 10038, on October 2, 2013, at
24 1:48 p.m., before a Notary Public of the State
of New York.

25

[Page 2]

1
2 APPEARANCES:
3
4 THE HARMAN FIRM, PC
5 Attorney for Plaintiffs
6 200 West 57th Street, Suite 900
7 New York, New York 10019
8
9 BY: PETER J. ANDREWS, ESQ.
10
11 KAUFMAN, DOLOWICH, VOLUCK & GONZO LLP
12 Attorneys for Defendants
13 100 William Street, Suite 215
14 New York, New York 10038
15
16 BY: YALE POLLACK, ESQ.
17
18 FILE #: 055611-0002
19
20
21
22
23
24
25

[Page 3]

1 STIPULATIONS
2
3 IT IS HEREBY STIPULATED AND AGREED by and
4 between the attorneys for the respective parties
5 herein, that filing, sealing and certification,
6 and the same are, hereby waived.
7
8 IT IS FURTHER STIPULATED AND AGREED that
9 all objections except as to the form of the
10 question, shall be reserved to the time of the
11 trial.
12
13 IT IS FURTHER STIPULATED AND AGREED that
14 the within deposition may be signed and sworn to
15 by an officer authorized to administer an oath,
16 with the same force and effect as if signed and
17 sworn to before the Court.
18
19
20
21
22
23
24
25

[Page 4]

1
2 TERESA JACKSON, the witness
3 herein, having been first duly sworn by a
4 Notary Public of the State of New York, was
5 examined and testified as follows:
6 EXAMINATION BY
7 MR. POLLACK:
8 Q. State your name for the record, please.
9 A. Teresa Jackson.
10 Q. State your address for the record,
11 please.
12 A. 21 Dickerman Street, Apartment 3, New
13 Haven, Connecticut 06511.
14 Q. Good afternoon, Ms. Jackson.
15 A. Hello. How are you?
16 Q. You were here for the deposition --
17 A. Yes.
18 Q. -- of your nephew, Marquis, right?
19 A. Yes.
20 Q. It's going to be a similar line of
21 questioning. I'm going to be asking you a
22 series of questions regarding your claims in
23 this action.
24 A. Okay.
25 Q. If you don't understand any question

[Page 5]

1 T. Jackson
2 that I ask, please just let me know.
3 A. Okay.
4 Q. I'll try to rephrase it until you
5 understand the question.
6 A. Okay. No problem.
7 MR. ANDREWS: Teresa, just wait
8 until Yale finishes the question, and
9 then answer the question.
10 THE WITNESS: Okay.
11 Q. Please just wait for me to finish the
12 question before answering because the court
13 reporter can't take us both speaking at the
14 same time, and please just make sure to answer
15 any question verbally so that the court
16 reporter can take down the answer. She can't
17 take down hand gestures or nods.
18 Do you understand those instructions?
19 A. Yes, I did.
20 MR. ANDREWS: Keep your voice up
21 too.
22 THE WITNESS: Okay.
23 Q. Are you taking any medications today?
24 A. I have blood pressure pills. I'm on
25 blood pressure pills and sugar.

[2] (Pages 2 to 5)

[Page 6]

1 T. Jackson
 2 Q. Do you think that those medications will
 3 have --
 4 A. No.
 5 Q. -- any impact --
 6 MR. ANDREWS: Again, that's an
 7 example. You have to let him finish.
 8 Wait, pause, answer.
 9 Q. -- on your ability to truthfully respond
 10 to my questions today?
 11 Do you think that those medications
 12 would have any impact on your ability to
 13 truthfully respond to my questions today?
 14 A. No.
 15 Q. Are you under the influence of drugs or
 16 alcohol right now?
 17 A. No.
 18 Q. Anything else that may impair your
 19 ability to truthfully respond to my questions
 20 today?
 21 A. No.
 22 Q. Did you review any documents in
 23 preparation for today's deposition?
 24 A. Yes.
 25 Q. What did you review?

[Page 7]

1 T. Jackson
 2 A. Did I review today or prior to today?
 3 Q. Prior to today.
 4 A. Yes.
 5 Q. What did you review?
 6 A. My affidavit.
 7 Q. Anything else?
 8 A. That's it.
 9 Q. Did you speak to anyone in preparation
 10 for today's deposition?
 11 A. Just my lawyer.
 12 Q. You didn't speak to Fernando Hernandez?
 13 A. No.
 14 Q. Are you currently employed?
 15 A. Yes, I am.
 16 Q. Where are you employed?
 17 A. PCF.
 18 Q. What do you do for PCF?
 19 A. Deliver newspaper.
 20 Q. How long have you been delivering
 21 newspapers for PCF?
 22 A. It's been a couple of months. I don't
 23 have an exact date.
 24 Q. Do you know what month?
 25 A. Maybe about March.

[Page 8]

1 T. Jackson
 2 Q. 2013?
 3 A. Yes.
 4 Q. How are you paid by PCF?
 5 A. Check.
 6 Q. Do you receive an hourly wage?
 7 A. No.
 8 Q. How is your compensation derived?
 9 A. By papers, newspapers.
 10 Q. "By papers," do you mean the number of
 11 papers delivered?
 12 A. Yes.
 13 MR. ANDREWS: Again, keep your
 14 voice up so she can hear you and take
 15 everything down.
 16 Q. Do you know if you're considered an
 17 independent contractor by PCF?
 18 MR. ANDREWS: Objection.
 19 Q. You can answer.
 20 MR. ANDREWS: You can answer.
 21 That's for the record.
 22 Q. Unless he tells you otherwise, you can
 23 answer my question.
 24 MR. ANDREWS: That's for the
 25 record.

[Page 9]

1 T. Jackson
 2 A. Yes.
 3 Q. Did you sign any type of agreement, an
 4 independent contractor agreement, with PCF?
 5 MR. ANDREWS: Objection.
 6 A. Yes.
 7 MR. POLLACK: I'm going to ask
 8 for a copy of the independent contractor
 9 agreement.
 10 A. I don't have it.
 11 Q. What days do you work for PCF, what days
 12 of the week?
 13 A. Every day.
 14 Q. What are your hours?
 15 A. Between 2:00 and 6:00 Monday through
 16 Friday, and 2:00 to 8:00 Saturdays and Sundays.
 17 Q. We're talking p.m., right, 2:00 in the
 18 afternoon to --
 19 A. Morning.
 20 Q. Okay. 2:00 in the morning to 6:00 a.m.
 21 2:00 a.m. to 8:00 p.m. on Saturdays and
 22 Sundays?
 23 A. Yes.
 24 MR. ANDREWS: Did you say p.m.?
 25 MR. POLLACK: A.m.

[3] (Pages 6 to 9)

[Page 10]

1 T. Jackson
 2 MR. ANDREWS: A.m., okay.
 3 Q. Where is PCF located?
 4 A. In Connecticut.
 5 Q. What city?
 6 A. Hamden.
 7 Q. Do you know how much you're paid per
 8 newspaper?
 9 A. I think it's between \$0.12 and \$0.15 a
 10 paper, per paper.
 11 Q. Does it vary?
 12 A. By the paper that you're delivering.
 13 Q. What papers do you deliver?
 14 A. New Haven Registers, Connecticut Post,
 15 New York Post, Daily News, New York Times,
 16 Barron, a few others.
 17 Q. Certain papers delivered may warrant
 18 \$0.15 while others may warrant \$0.12 per
 19 delivery?
 20 MR. ANDREWS: Objection.
 21 A. Between that, that range.
 22 MR. ANDREWS: Objection.
 23 Q. Do you know how many papers you deliver
 24 between Monday and Friday on one given day?
 25 A. Between 190 to maybe 250.

[Page 11]

1 T. Jackson
 2 Q. That's Mondays through Fridays?
 3 A. Pretty much, yes.
 4 Q. What about on Saturdays and Sundays?
 5 A. It's about 250, 240. Actually, it's
 6 more because I do residential and commercial.
 7 Sorry.
 8 Q. It's more when?
 9 A. It's more -- it's more papers. I forgot
 10 about my commercial. That's residential.
 11 Q. How many commercial do you deliver for
 12 Monday through Friday?
 13 A. Commercial, it's about 200.
 14 Q. What about Saturday and Sunday?
 15 A. Saturday/Sunday, it's about 500.
 16 Q. Do you receive a different rate for the
 17 commercial paper deliveries?
 18 A. Yes, you do.
 19 Q. What's that?
 20 A. You get paid by bulk.
 21 Q. Is that pounds?
 22 A. No. Bulk is the amount of paper you're
 23 delivering to each door.
 24 Q. Can you give me an example of what the
 25 pay structure is?

[Page 12]

1 T. Jackson
 2 A. It's like if I deliver forty and below,
 3 it might be \$0.30. Forty and sixty, it'll be
 4 maybe \$0.40, somewhere like that. The more you
 5 deliver, the more the pay rate goes.
 6 Q. The higher the pay rate is?
 7 A. Yeah.
 8 Q. Before March 2013, were you employed?
 9 A. Before March 2013, yes.
 10 Q. By who?
 11 A. By Eli's.
 12 Q. Can you spell that?
 13 A. E-L-I.
 14 Q. What is that?
 15 A. It's a -- sort of like a pizzeria.
 16 Q. What'd you do there?
 17 A. Deliveries.
 18 Q. Where is Eli's located?
 19 A. Hamden, Connecticut.
 20 Q. How far is Hamden from your residence?
 21 A. It's about ten, fifteen minutes.
 22 Q. Drive?
 23 A. Yeah.
 24 Q. How long did you work for Eli's?
 25 A. It was only a couple of months.

[Page 13]

1 T. Jackson
 2 Q. All in 2013 or also in 2012?
 3 A. I would say end of -- maybe end of 2012
 4 to beginning of 2013.
 5 Q. Was there any gap in employment between
 6 Eli's and PCF?
 7 A. No.
 8 Q. You ended Eli's around February 2013?
 9 A. I can't give you a specific date. I
 10 don't remember that.
 11 MR. ANDREWS: Try to keep your
 12 voice up.
 13 THE WITNESS: Okay.
 14 MR. ANDREWS: You're soft
 15 spoken. Try to keep your voice up.
 16 THE WITNESS: Okay.
 17 Q. How were you paid by Eli's?
 18 A. That was an hourly rate and also
 19 mileage.
 20 Q. Do you know the hours that you worked at
 21 Eli's?
 22 A. That depends if I delivered breakfast,
 23 if I delivered lunch, if I delivered dinner.
 24 Q. Did you work anywhere between Late Night
 25 and Eli's?

[4] (Pages 10 to 13)

[Page 14]

1 T. Jackson
 2 MR. ANDREWS: Objection.
 3 A. No. Oh, I did do a flower delivery. I
 4 don't remember the dates for that.
 5 Q. Do you remember the name of the --
 6 A. It was Bloom's.
 7 Q. Bloom's?
 8 A. Bloom's Flower.
 9 Q. B-L-O-O-M-S?
 10 A. B-L -- yes.
 11 Q. Where is that located?
 12 A. That's in North -- North Haven,
 13 Connecticut.
 14 Q. How were you paid by Bloom's?
 15 A. Hourly, \$9 an hour plus, mileage.
 16 Q. Do you remember what your wage rate was
 17 at Eli's?
 18 A. My wage? I think it was -- I think it
 19 was eleven.
 20 Q. Do you remember what your reimbursement
 21 for mileage was at Eli's?
 22 MR. ANDREWS: Objection.
 23 A. About \$0.35 maybe.
 24 Q. What about at Bloom's?
 25 A. Bloom's -- I don't remember Bloom's.

[Page 15]

1 T. Jackson
 2 Q. Can you just briefly describe your
 3 educational background?
 4 A. I graduated from twelfth grade.
 5 Q. From where?
 6 A. Twelfth grade, high school.
 7 Q. High school?
 8 A. Uh-huh.
 9 Q. What year?
 10 A. 2000 -- I'm sorry. '87, 1987.
 11 Q. What high school was that?
 12 A. Lincoln High School.
 13 Q. Where is that located?
 14 A. Yonkers, New York.
 15 Q. Are you currently married?
 16 A. Yes, I am.
 17 Q. What's your husband's name?
 18 A. Delroy McNeil.
 19 Q. How long have you been married to your
 20 husband?
 21 A. It's now five years.
 22 Q. Any prior marriages?
 23 A. Yes.
 24 Q. To whom?
 25 A. Scott Fields.

[Page 16]

1 T. Jackson
 2 Q. Fields?
 3 A. Fields, yes.
 4 Q. When were you married to Scott Fields?
 5 A. I don't remember the year. I was
 6 twenty-six. I can't do the math right now.
 7 Q. How long were you married to Scott
 8 Fields?
 9 A. Eight years.
 10 Q. Do you have any children?
 11 A. Yes, I do.
 12 Q. How many children?
 13 A. One.
 14 Q. Boy or girl?
 15 A. Girl.
 16 Q. What is her name?
 17 A. Ashley Owens.
 18 Q. Is she a child from Scott Fields?
 19 A. No.
 20 Q. From Delroy McNeil?
 21 A. No.
 22 Q. Do you know her father's name?
 23 A. Yes, James Owens.
 24 Q. What is her date of birth?
 25 A. Her date of birth is 3/15/88.

[Page 17]

1 T. Jackson
 2 Q. Does she currently reside with you?
 3 A. Yes, she does.
 4 Q. Does anyone else reside with you besides
 5 your daughter?
 6 A. My nephew.
 7 Q. Is that Mr. Acklin?
 8 A. Yes.
 9 Q. Mr. Acklin's your nephew?
 10 A. Yes.
 11 Q. Do you have any relationship to
 12 Cecilia Jackson?
 13 A. That is my sister.
 14 Q. Have you ever been deposed before?
 15 A. No.
 16 Q. Have you ever been involved in a lawsuit
 17 before?
 18 A. No.
 19 Q. Now I'm going to show you a document
 20 that's been previously marked for
 21 identification as Defendant's Exhibit 13 on
 22 September 20, 2013, and I'm going to ask if
 23 you've ever seen that document before today
 24 (handing).
 25 A. This one, no.

[5] (Pages 14 to 17)

[Page 18]

1 T. Jackson
 2 (Whereupon, Notice of EBT was
 3 marked as Defendant's Exhibit 48, for
 4 identification, as of this date.)
 5 Q. Just looking back at Defendant's 13,
 6 when you say that you haven't seen "this one",
 7 have you seen another version of this document?
 8 MR. ANDREWS: Objection.
 9 A. Another version of this one?
 10 Q. Yes.
 11 A. No.
 12 Q. Do you see your name in the caption of
 13 this document?
 14 A. This one, yes.
 15 Q. Do you understand that you're a
 16 plaintiff --
 17 A. Yes, I am.
 18 Q. -- in an action?
 19 Do you understand what your claims are
 20 in this action?
 21 A. Yes, I do.
 22 Q. What do you understand your claims to
 23 be?
 24 A. My wages.
 25 Q. What do you mean by that?

[Page 19]

1 T. Jackson
 2 A. This is pertaining to our wages that we
 3 weren't paid for overtime.
 4 Q. Now I'm showing you a document that's
 5 been marked for identification as Defendant's
 6 Exhibit 48 (handing).
 7 I'm going to ask if you've seen that
 8 document before today.
 9 A. No, not this one.
 10 Q. I'm now showing you what's been marked
 11 for identification as Defendant's Exhibit 4 on
 12 September 17, 2013 (handing).
 13 I'm going to ask if you've seen that
 14 document before today.
 15 A. No.
 16 Q. I'm now showing you what's been marked
 17 for identification as Defendant's Exhibit 5 on
 18 September 17, 2013, and I'm going to ask if
 19 you've ever seen that document before today
 20 (handing).
 21 A. No.
 22 Q. Did you provide any documents to your
 23 attorneys regarding your claims in this action?
 24 A. Yes.
 25 Q. Do you know what you produced?

[Page 20]

1 T. Jackson
 2 A. A number of things, my manifests, my
 3 schedule.
 4 Q. Anything else?
 5 A. That's all I can remember right now.
 6 Q. Are manifests different than schedules?
 7 A. Yes.
 8 Q. What is your understanding of what a
 9 manifest is?
 10 A. A manifest has all the customers' names
 11 and address that I deliver to.
 12 Q. Names and addresses?
 13 A. Yes.
 14 Q. Did you receive manifests when you were
 15 performing work as a driver for Late Night?
 16 A. Did I receive -- yes, I received
 17 manifests.
 18 MR. ANDREWS: Objection.
 19 Q. How frequently did you receive
 20 manifests?
 21 A. Excuse me?
 22 Q. How frequently did you receive
 23 manifests?
 24 A. Every day.
 25 Q. What would be on the schedule you

[Page 21]

1 T. Jackson
 2 referred to earlier?
 3 A. The schedule had the time that I was
 4 supposed to be there.
 5 Q. When would you receive a schedule?
 6 A. I only received a schedule one time.
 7 Q. Have you heard of the company Late Night
 8 Express Courier Services, Inc.?
 9 A. Late Night Express is on my check.
 10 Q. If I refer to Late Night, being
 11 Late Night Express Courier Services, Inc., for
 12 the remainder of the deposition, would you know
 13 what I'm referring to?
 14 MR. ANDREWS: Objection.
 15 A. Late Night --
 16 Q. If I abbreviate the term Late Night to
 17 refer to Late Night Express Courier Services,
 18 Inc. for purposes of simplicity in this
 19 deposition, will you understand that whenever I
 20 say Late Night, that means Late Night Express
 21 Courier Services, Inc.?
 22 A. Late Night Express --
 23 MR. ANDREWS: Objection.
 24 A. -- is on my check.
 25 (Whereupon, a recess was taken)

[6] (Pages 18 to 21)

[Page 22]

1 T. Jackson
 2 at this time.)
 3 Q. You said Late Night Express appeared on
 4 your checks?
 5 A. On my checks, yes.
 6 Q. What checks are you referring to?
 7 A. The checks that I get from Fresh Diet.
 8 Q. Do you know what the relationship is
 9 between the Late Night Express and The Fresh
 10 Diet?
 11 MR. ANDREWS: Objection.
 12 A. I really don't know.
 13 Q. Is it your understanding that when you
 14 performed work you performed work for The Fresh
 15 Diet?
 16 A. Yes.
 17 Q. What work did you perform for The Fresh
 18 Diet?
 19 A. I was a delivery driver.
 20 Q. From when?
 21 A. From -- I'm not good with dates. Summer
 22 of 2007.
 23 Q. Until when?
 24 A. Summer of 2011.
 25 Q. Do you remember the month you started?

[Page 23]

1 T. Jackson
 2 A. Started? June maybe.
 3 Q. Do you remember the month you ended?
 4 A. Anywhere from July to August.
 5 Q. How did your relationship with The Fresh
 6 Diet end?
 7 A. How did it end?
 8 Q. Yes.
 9 A. My mom was diagnosed with breast cancer.
 10 Q. Did you resign?
 11 A. No.
 12 MR. ANDREWS: Objection.
 13 A. I asked for a leave of absence, and then
 14 during the time I was on leave, they took my
 15 route.
 16 Q. Who did you ask for leave of absence?
 17 A. Syed.
 18 Q. What did he say?
 19 A. Okay. That I had to train somebody to
 20 do my route.
 21 Q. Did you train anybody?
 22 A. Yes, I did.
 23 Q. Who?
 24 A. His name is Gene. Kimble, I think, is
 25 his last name.

[Page 24]

1 T. Jackson
 2 Q. How did you train him?
 3 A. What do you mean?
 4 Q. You said you trained him.
 5 A. Yes.
 6 Q. Gene Kimble?
 7 A. Yes.
 8 Q. What did that entail?
 9 A. I would -- when we go into the facility,
 10 I would show him where to pick up his bags,
 11 show him how to fill out the manifests, take
 12 him out on my route with me, show him where --
 13 where it is he had to go, the different stops
 14 that he had to go to.
 15 Q. Did there come a time that you asked to
 16 return to be a driver?
 17 A. I was supposed to only be out for a
 18 month.
 19 Q. Did you ever ask to come back?
 20 A. Yes, I did.
 21 Q. Who'd you ask?
 22 A. Syed.
 23 Q. What'd he say?
 24 A. He -- he refused to let me come back on
 25 the same route, which he told me that I would

[Page 25]

1 T. Jackson
 2 come back on.
 3 Q. Did he offer you another route?
 4 A. He offered me, if I'm not mistaken,
 5 Jersey and also, I think, Long Island.
 6 Q. What'd you say?
 7 A. I told him that he promised me that I
 8 would get Connecticut.
 9 Q. Did you refuse to take those routes?
 10 A. I didn't refuse to take them. I just
 11 told him that he -- that he told me that he was
 12 going to put me back on Connecticut. I didn't
 13 refuse anything, no.
 14 Q. Did you ever go back to working as a
 15 driver?
 16 A. No.
 17 Q. Why not?
 18 A. Because he didn't give me back
 19 Connecticut.
 20 Q. When you started performing work as a
 21 driver, where was The Fresh Diet located?
 22 A. When I started? In New Jersey.
 23 Q. Do you know if it was a store front or a
 24 kitchen?
 25 A. It was -- it was like a catering hall

[7] (Pages 22 to 25)

[Page 26]

1 T. Jackson
 2 that had a kitchen in the back.
 3 Q. Do you know the name of the catering
 4 hall?
 5 A. No, I don't.
 6 Q. Do you know the city it was located in?
 7 A. Lyndhurst, something like that. I don't
 8 really remember. I think it was Lyndhurst.
 9 Q. How did you hear about the position?
 10 A. A friend.
 11 Q. Who?
 12 A. Oh, boy. What was her name? I don't
 13 remember her name. I don't remember her name.
 14 Q. Do you know if that person was working
 15 as a driver?
 16 A. Yes, she was.
 17 Q. Do you remember what she told you?
 18 A. When she introduced me to the job?
 19 Q. Yes.
 20 MR. ANDREWS: Objection.
 21 A. She just -- she was doing a route, and
 22 she -- I started because she wanted me to split
 23 the route with her to make it easier for her
 24 because she did a second job. So I started out
 25 doing half of the route with her.

[Page 27]

1 T. Jackson
 2 Q. Where was that route?
 3 A. Connecticut and Westchester.
 4 Connecticut and New York.
 5 Q. Did you have a job at the time you
 6 started?
 7 A. When I started? Yes.
 8 Q. Where was that?
 9 A. PCF.
 10 Q. What were you doing for PCF at that
 11 time?
 12 A. Paper delivery.
 13 Q. How long had you been working for PCF?
 14 A. At that time, I was there a couple
 15 months.
 16 Q. Where was PCF located?
 17 A. In Elmsford, New York.
 18 Q. Elmsford?
 19 A. Elmsford, yeah.
 20 Q. Do you know the address?
 21 A. No.
 22 Q. Do you know if they're still there?
 23 A. I don't know.
 24 Q. What hours were you performing work for
 25 PCF?

[Page 28]

1 T. Jackson
 2 A. PCF was same thing as the Connecticut
 3 one. It's 2:00 to 6:00 Monday through Friday
 4 and 2:00 to -- 2:00 to 8:00 Saturday and
 5 Sunday.
 6 Q. A.m.?
 7 A. Yes.
 8 Q. Did you ever stop performing work for
 9 PCF?
 10 A. Yes.
 11 Q. When?
 12 A. When the work at Fresh Diet became too
 13 much for me to handle because the routes -- the
 14 routes became bigger, so I didn't have time to
 15 get over to PCF.
 16 Q. Do you know what month you stopped doing
 17 both?
 18 A. No, I don't know that.
 19 Q. There was a period of time where you
 20 were performing deliveries for both PCF and
 21 The Fresh Diet?
 22 A. Yes.
 23 MR. ANDREWS: Objection.
 24 Q. Do you know how many months that was?
 25 A. It wasn't long.

[Page 29]

1 T. Jackson
 2 Q. After you started performing deliveries
 3 for The Fresh Diet, did you ever hold another
 4 position at any other job during that time?
 5 A. I did work for -- what's the name of the
 6 place? Oh, boy. Riverside Cardiology, I
 7 believe.
 8 Q. A doctor's office?
 9 A. Or -- no. It was -- no. At that time,
 10 no. I think I was doing Riverside and PCF
 11 together, and then I found out about
 12 Fresh Diet, and then I stopped Riverside and
 13 did PCF and Fresh Diet, I think.
 14 Q. Just during the time you were performing
 15 deliveries for The Fresh Diet.
 16 A. Right. It was just PCF.
 17 Q. There wasn't any other position you held
 18 during the daytime or any other hours while you
 19 were performing delivery work for The Fresh
 20 Diet?
 21 A. From what I can remember, no. From what
 22 I can remember, no.
 23 Q. When you were splitting the route with
 24 your friend, did anyone at The Fresh Diet know
 25 about that?

[8] (Pages 26 to 29)

[Page 30]

1 T. Jackson
 2 MR. ANDREWS: Objection.
 3 A. Yes, Syed.
 4 Q. Had you met Syed at the time you started
 5 splitting the route with your friend?
 6 MR. ANDREWS: Objection.
 7 A. I met Syed when she took me there the
 8 very first day.
 9 Q. What did Syed tell you about the
 10 position when you met with him the first day?
 11 A. Just what it entailed, what your duties
 12 were.
 13 Q. What was that?
 14 A. To deliver Fresh Diet bags to
 15 residential customers.
 16 Q. At the time you started, you did not
 17 have your own route; is that correct?
 18 MR. ANDREWS: Objection.
 19 A. Not in the beginning.
 20 Q. How was the route split up?
 21 MR. ANDREWS: Objection.
 22 A. If I'm not mistaken, I think she did a
 23 Connecticut portion of it, and I did a New York
 24 portion.
 25 Q. Can you explain what you would do on a

[Page 31]

1 T. Jackson
 2 day that you were splitting the route with your
 3 friend and performing deliveries into New York?
 4 MR. ANDREWS: Objection.
 5 A. We go pick up the food. Sometimes it
 6 would be ready, sometimes it's not. If it's
 7 not, we would help, you know, do whatever's
 8 left to do, bag it up, bag tie it, put ice,
 9 whatever needed to be done at that time, and
 10 after we finished that, we collect the
 11 manifests and put our bags in the car and go do
 12 the deliveries.
 13 Q. Were your deliveries, at that time,
 14 exclusively in New York?
 15 A. At that time, yes.
 16 Q. Do you know how many stops?
 17 A. I did? No. Not at that time, no. I
 18 would say, if I had to guess, maybe fifteen.
 19 Q. How were you paid?
 20 A. Stops and miles.
 21 Q. What was the payment per mile?
 22 A. \$0.53 a mile, a dollar a stop.
 23 Q. I'm just focusing when it was in
 24 New Jersey for right now.
 25 A. Okay.

[Page 32]

1 T. Jackson
 2 Q. What time would you show up to the
 3 facility?
 4 A. Different times.
 5 Q. What would be the earliest you would
 6 show up?
 7 A. The earliest, maybe around 3:00.
 8 Q. What would be the latest?
 9 A. The latest, maybe about 6:00.
 10 Q. How would you know when to show up at
 11 3:00 as opposed to 6:00?
 12 A. Well, I would get a phone call or a
 13 text.
 14 Q. From who?
 15 A. From Syed.
 16 Q. What would it say?
 17 A. The food is --
 18 MR. ANDREWS: Objection.
 19 A. The food is ready.
 20 Q. Is that how, typically, it worked every
 21 day for you to know when to --
 22 A. No.
 23 Q. -- show up to the facility?
 24 A. Not every day, no.
 25 MR. ANDREWS: Remember, let him

[Page 33]

1 T. Jackson
 2 finish the question, and then answer.
 3 A. Oh, I'm sorry. Not every day.
 4 Q. If you didn't get a call or a text, what
 5 time would you show up?
 6 MR. ANDREWS: Objection.
 7 A. Anywhere between 3:00 and 6:00.
 8 Q. If you showed up at 3:00, would meals be
 9 ready to be delivered at that time?
 10 A. Not all the time.
 11 Q. Sometimes?
 12 A. Sometimes.
 13 Q. If they were ready at 3:00, would you
 14 start deliveries then?
 15 A. If they were ready at 3:00 -- if
 16 everything was ready at 3:00 and bagged, yes.
 17 Q. Were there certain days of the week you
 18 would show up at 3:00 p.m. and certain days of
 19 the week you would show up at 6:00 p.m.?
 20 A. It just varies.
 21 Q. How long would it take you to perform
 22 deliveries at the time you were in New Jersey
 23 delivering to New York?
 24 A. Was that before we split the route or
 25 after?

[9] (Pages 30 to 33)

[Page 34]

1 T. Jackson
2 Q. At the beginning.
3 A. At the beginning when I started on a
4 half a route, you want to know the time that
5 we -- I finished?
6 Q. Yes.
7 A. It varies.
8 Q. The earliest you would be done.
9 A. Maybe 3:00.
10 Q. 3:00 a.m.?
11 A. Yes.
12 Q. What about the latest?
13 A. Maybe about 5:00, 6:00 in the morning.
14 Q. What would make it change that you would
15 be done at 3:00 a.m. on some days compared to
16 5:00 or 6:00 a.m. on other days?
17 A. Depends on the miles and the stops.
18 Q. That was not always the same?
19 A. No, not all the time.
20 Q. Were there ever times where you would
21 show up at 6:00 p.m. to start your deliveries
22 and end at 3:00 a.m.?
23 MR. ANDREWS: Objection.
24 A. It's possible. It's possible depending
25 on all the stops and the miles.

[Page 35]

1 T. Jackson
2 Q. Did you ever show up later than
3 6:00 p.m.? Again, focusing on the New Jersey
4 facility right now.
5 A. I don't -- I don't know. I don't think
6 so.
7 Q. When you got your own route, did the
8 hours change?
9 MR. ANDREWS: Objection.
10 A. I would still come in around the same
11 time, between 3:00 and 6:00.
12 Q. Would the times you would finish be
13 different?
14 A. Depending on my hours and stops, my
15 stops and my miles.
16 Q. Again, this is when you're in
17 New Jersey, and now you have your own route.
18 Okay?
19 A. Right.
20 Q. What would be the earliest you would be
21 done at that time?
22 A. Anywhere from 3:00 in the morning.
23 Q. Until what time?
24 A. Until 5:00 or 6:00 in the morning.
25 Q. Where was your route when you had your

[Page 36]

1 T. Jackson
2 own route?
3 A. At that time, I started doing
4 Connecticut and New York by myself. She quit.
5 Q. Would you perform stops in both
6 Connecticut and New York in the same night?
7 A. Yes. At that time, yes.
8 Q. How many stops were there when you got
9 your own route?
10 MR. ANDREWS: Objection.
11 A. It varies.
12 Q. What would be the minimum number of
13 stops?
14 A. Minimum, maybe twenty, twenty-five.
15 Q. What about the maximum?
16 A. Maybe about thirty, thirty-five.
17 Q. How far did you live, driving time, from
18 the New Jersey facility?
19 A. Maybe thirty, forty minutes depending on
20 traffic.
21 Q. When you finished a route when you were
22 working from the New Jersey facility, did you
23 go back to the New Jersey facility?
24 A. Not New Jersey, no.
25 Q. Where would you go after you were done?

[Page 37]

1 T. Jackson
2 A. Home.
3 Q. Would you have the empty bags in your
4 car?
5 A. Yes.
6 Q. Did you report to anyone at The Fresh
7 Diet when you finished your route?
8 A. Sometimes Syed.
9 Q. Were there times that you did not
10 report?
11 A. Sometimes, yes.
12 Q. What would make you report as opposed to
13 not report on a given night?
14 A. Sometimes he would ask for us to report,
15 and it depends on if there's any problems,
16 maybe bad weather. It depends on whatever's
17 going on during that time.
18 Q. There were times that nobody would have
19 known from The Fresh Diet when you finished
20 your route?
21 MR. ANDREWS: Objection.
22 A. At that time, I don't remember.
23 Q. Did the location of The Fresh Diet
24 facility ever change from New Jersey to another
25 location?

[10] (Pages 34 to 37)

[Page 38]

1 T. Jackson
 2 A. Yes.
 3 Q. Where did it first change to during the
 4 time you were performing --
 5 A. After New Jersey?
 6 Q. After New Jersey.
 7 A. Connecticut.
 8 Q. Do you know where in Connecticut?
 9 A. I don't remember the address, but I know
 10 it was Stamford.
 11 Q. Did The Fresh Diet have its own kitchen
 12 at that location?
 13 A. No.
 14 Q. Was it similar to the catering place --
 15 A. Yes.
 16 Q. -- in New Jersey?
 17 A. Yes.
 18 Q. Did your duties change --
 19 A. At that time, yes.
 20 Q. How did they change?
 21 A. At that time, we didn't have packers in
 22 the beginning, so we had to pack and sort out
 23 the food and put ice on them and bag ties.
 24 Q. In New Jersey you had to do that?
 25 A. No. We did it in New Jersey, but when

[Page 39]

1 T. Jackson
 2 we moved from New Jersey to Connecticut, we
 3 didn't have any packers at all. In New Jersey,
 4 there were the people -- in the New Jersey
 5 kitchen, there were a few packers, so we would
 6 help them, but once we moved to Connecticut,
 7 there were no packers at all until maybe --
 8 maybe a week or two after we got there.
 9 Q. Then there were packers?
 10 A. Then they started hiring packers.
 11 Q. Going back to when you first started, do
 12 you know what other drivers there were working
 13 for The Fresh Diet at that time?
 14 A. No. At that time, no.
 15 Q. Do you recall any other drivers that
 16 were working other than you and your friend?
 17 A. It was Kenneth. It was my nephew.
 18 Q. Kenneth Chow?
 19 A. Yes.
 20 It was David Williams. It was a guy
 21 named Ken. There was a few other people, but I
 22 don't remember everybody's name.
 23 Q. You moved to Connecticut.
 24 Did your route change?
 25 A. It got bigger.

[Page 40]

1 T. Jackson
 2 Q. How did it get bigger?
 3 A. Got more stops.
 4 Q. What states were you performing
 5 deliveries in?
 6 A. Still New York and Connecticut.
 7 Q. Did the pay structure change?
 8 A. No, not in Connecticut.
 9 Q. But you got more stops?
 10 A. I got more stops, yes.
 11 Q. How many stops did you get when the
 12 facility moved to Connecticut?
 13 A. I think I was -- at that time, I was
 14 getting anywhere between thirty or forty maybe.
 15 Q. Did the hours change?
 16 A. It was pretty much the same hours.
 17 Q. They varied day to day?
 18 A. Yes. Depending on what needed to be
 19 done, yes.
 20 Q. How far away did you live, driving time,
 21 from the Connecticut facility?
 22 A. Maybe forty or fifty minutes depending
 23 on traffic.
 24 Q. You would still arrive sometime between
 25 3:00 p.m. and 6:00 p.m.?

[Page 41]

1 T. Jackson
 2 A. Yes.
 3 Q. And be finished sometime between
 4 3:00 a.m. and 6:00 a.m.?
 5 A. Sometimes, yes.
 6 Q. Were you ever done earlier than
 7 3:00 a.m.?
 8 A. I don't think so.
 9 Q. Did you ever start later than 6:00 p.m.?
 10 A. Yes.
 11 Q. What was the latest you would start?
 12 A. The latest? That varies. I don't have
 13 an answer for you.
 14 Q. Would you ever start at 7:00 p.m.?
 15 A. Sometimes.
 16 Q. Would you ever start at 8:00 p.m.?
 17 A. Sometimes.
 18 Q. Would you ever start at 9:00 p.m.?
 19 A. Sometimes.
 20 Q. Would you ever start at 10:00 p.m.?
 21 Again, we're just focused on the
 22 Connecticut location right now.
 23 A. In Connecticut, I really don't know. It
 24 depends on whenever we finished packing up and
 25 putting everything in our car.

[11] (Pages 38 to 41)

[Page 42]

1 T. Jackson
2 Q. Did you ever arrive at the Connecticut
3 facility later than 6:00 p.m.?
4 A. No, I don't think so.
5 Q. Do you know when Fresh Diet moved from
6 New Jersey to Connecticut?
7 A. Do I know a year?
8 Q. The year.
9 A. I don't know if it was between 2008 or
10 2009. I can't give you the date. I don't
11 remember that.
12 Q. Did it ever move locations from
13 Connecticut to another facility?
14 A. Connecticut to Brooklyn.
15 Q. Do you remember what year that happened?
16 A. Anywhere from 2009 to 2010.
17 Q. Do you remember the street address of
18 the location in Brooklyn?
19 A. The first one was Siegel Street.
20 Q. Was there a second one?
21 A. Yes.
22 Q. Where was that?
23 A. I don't remember the exact address. I
24 know it started with a B.
25 Q. Does Baltic sound familiar?

[Page 43]

1 T. Jackson
2 A. Sounds familiar.
3 Q. When the facility moved to the
4 Siegel Street location --
5 A. Yes.
6 Q. -- did it have its own kitchen at that
7 time?
8 A. At that time, yes, they had their own
9 kitchen.
10 Q. Were there packers?
11 A. At that time, yes. The ones from
12 Connecticut followed. Yes.
13 Q. Did your duties change when the location
14 was moved to Siegel Street?
15 A. No, still help pack whenever needed,
16 help put bag ties on, help sort out food,
17 help -- whatever needed to be done on that day
18 to get us out.
19 Q. Did the hours change when it was moved
20 to the Siegel Street location?
21 A. In the beginning, no. Towards the
22 middle is when I think they gave us a schedule.
23 Q. The middle of the time they were at the
24 Siegel Street location?
25 A. At the Siegel Street location.

[Page 44]

1 T. Jackson
2 Q. How far were you living from the
3 Brooklyn facility at the Siegel Street
4 location?
5 A. I ended up moving to Brooklyn with them.
6 Q. How far of a drive was it?
7 A. Depending on traffic, I would say about
8 fifteen, twenty minutes.
9 Q. Did you have the same route when it was
10 moved to the Siegel Street location?
11 A. Pretty much, yes. We ended up switching
12 routes at the Siegel Street. I got the
13 New Jersey route that my nephew had, and he
14 took the Connecticut route.
15 Q. Do you know how many stops the
16 New Jersey route had?
17 A. I don't remember.
18 Q. Can you approximate?
19 A. Twenty-five to thirty-five. It was
20 actually New Jersey and New York.
21 Q. This route made stops in both New Jersey
22 and New York?
23 A. Yes.
24 Q. On the same night, you would make stops
25 in both states?

[Page 45]

1 T. Jackson
2 A. Yes.
3 Q. Do you remember the cities that you
4 delivered to in New Jersey?
5 A. It varies. I would say I remember
6 Princeton because I did the -- I ended up doing
7 the Philly drop-offs to Princeton. Allentown,
8 I think. I don't remember all of the towns.
9 Q. Where were you delivering in New York?
10 A. New York was mainly Staten Island and
11 Brooklyn.
12 Q. Did the route ever change again for you?
13 A. For me? After a while, I went back to
14 Connecticut, yes.
15 Q. When was that?
16 Was Fresh Diet still in the
17 Siegel Street location or Baltic when you
18 started doing the Connecticut route again?
19 A. I don't remember. I don't remember.
20 Q. When you were doing the Connecticut
21 route, was that more stops than the
22 New Jersey/New York route?
23 A. I don't remember that either. I can't
24 honestly tell you that.
25 MR. POLLACK: Can we take a

[12] (Pages 42 to 45)

[Page 46]

1 T. Jackson
 2 quick two-minute break?
 3 MR. ANDREWS: Yes.
 4 (Whereupon, a recess was taken
 5 at this time.)
 6 Q. Going back to when you were in the
 7 Connecticut location, did you ever report back
 8 to the facility at the end of your route?
 9 A. In Connecticut?
 10 Q. Yes.
 11 A. No.
 12 Q. Would you ever report to anyone at
 13 The Fresh Diet that you had finished a delivery
 14 when they were at the Connecticut location?
 15 A. Sometimes Syed.
 16 Q. Sometimes you wouldn't?
 17 A. Sometimes I wouldn't, no.
 18 Q. When it was at the Siegel Street
 19 location, did you report back to the facility
 20 at the end of a route?
 21 A. Yes, but I didn't -- I think that's when
 22 they started making us bring the bags back.
 23 Q. Do you remember when that happened?
 24 A. The date? No.
 25 Q. The year?

[Page 47]

1 T. Jackson
 2 A. Maybe 2010, 2009.
 3 Q. When you say "they started making us
 4 bring the bags back," what do you mean? How
 5 did that happen?
 6 A. Well, that happened -- that started
 7 because they were calling us to come in early
 8 because they didn't have enough bags, so we
 9 would have to come in earlier sometimes to
 10 bring in our empties. So then that's when they
 11 started coming up with you had to come back at
 12 the end of the night to bring the empties back.
 13 Q. Did you do that?
 14 A. Come back at the end of the night?
 15 Q. Yes.
 16 A. Yes, sometimes. Not all the time,
 17 sometimes.
 18 Q. If you ever didn't bring the bags back
 19 at the end of the night, were you ever
 20 disciplined?
 21 A. At that time -- at that time, no,
 22 because I lived close by, so I would bring them
 23 early the next day.
 24 Q. Did you ever enter into any type of
 25 agreement with Late Night Express?

[Page 48]

1 T. Jackson
 2 MR. ANDREWS: Objection.
 3 A. With Late Night Express?
 4 Q. Yes.
 5 A. No.
 6 (Whereupon, Late Night Express
 7 Independent Contractor Agreement was
 8 marked as Defendant's Exhibit 49, for
 9 identification, as of this date.)
 10 Q. Now I'm going to show you a document
 11 that's been marked for identification as
 12 Defendant's Exhibit 49 (handing).
 13 A. Okay.
 14 Q. I'm going to ask you to look through
 15 that document and tell me if you've ever seen
 16 that before today.
 17 A. This is the contract?
 18 Q. I'm just asking if you've seen that
 19 document before today.
 20 A. Yes.
 21 Q. Is that your signature?
 22 A. Yes, it is.
 23 Q. Does your signature appear on the fourth
 24 page of the document?
 25 A. No, that's not the fourth page.

[Page 49]

1 T. Jackson
 2 MR. ANDREWS: He's asking you
 3 about this page (indicating).
 4 THE WITNESS: Oh. Oh. Oh.
 5 Okay.
 6 A. Yeah, that is the fourth page. Okay.
 7 Yes.
 8 Q. On the --
 9 A. Yes.
 10 Q. -- document marked FD000780?
 11 A. Yes.
 12 Q. Does your signature appear on the
 13 following page, FD000781?
 14 A. Yes.
 15 Q. Does your signature appear on the
 16 document FD000782?
 17 A. Yes. 782, yes.
 18 Q. Do you know if you signed this document
 19 on or about October 10, 2010?
 20 A. October 10th? Yes, that's the date
 21 that's here.
 22 Q. Did you read this document before you
 23 signed it?
 24 A. I read some of it, not all.
 25 Q. What is your understanding of what this

[13] (Pages 46 to 49)

[Page 50]

1 T. Jackson
2 document is?
3 MR. ANDREWS: Objection.
4 A. It's just telling us our
5 responsibilities and duties and our
6 requirements from Fresh Diet.
7 Q. Did you understand paragraph 11 of the
8 document when you signed it?
9 A. Paragraph 11?
10 MR. ANDREWS: Objection.
11 A. Okay. Repeat that question.
12 Q. Did you understand that provision or
13 that paragraph when you signed the document?
14 MR. ANDREWS: Objection.
15 A. At the time, no, I didn't read that
16 part.
17 Q. Did you understand yourself to be an
18 independent contractor of The Fresh Diet at the
19 time you were performing deliveries?
20 MR. ANDREWS: Objection.
21 A. At that time, that's what Fresh Diet
22 told us.
23 (Whereupon, Class action
24 affidavit was marked as Defendant's
25 Exhibit 50, for identification, as of

[Page 51]

1 T. Jackson
2 this date.)
3 Q. I'm now showing you what's been marked
4 for identification as Defendant's Exhibit 50,
5 and I'm going to ask if you've seen that
6 document before today (handing).
7 A. Yes.
8 Q. What is your understanding of that
9 document?
10 A. That one?
11 Q. Yes.
12 A. This is to -- this is pertaining to our
13 wages and overtime that we didn't get paid for.
14 Q. Is this a copy of the affidavit you
15 referred to earlier that you reviewed in
16 preparation for today's deposition?
17 A. This is a copy of my affidavit, yes.
18 Q. Earlier, you said that you had reviewed
19 your affidavit in preparation for today's
20 deposition, correct?
21 A. Yes, mine. Yes.
22 Q. Is this a copy of the document you
23 reviewed?
24 A. Yes, this looks like a copy of it.
25 Q. Is that your signature on the third page

[Page 52]

1 T. Jackson
2 of the document?
3 A. Yes, it is.
4 Q. Did you sign it on or about
5 January 25, 2013?
6 A. Yes.
7 Q. How long have you been a Connecticut
8 resident?
9 A. Two years now.
10 Q. Three years?
11 A. Two.
12 Q. Where did you live before Connecticut?
13 A. Brooklyn.
14 Q. Do you know the address?
15 A. I think it was 826 Thomas Boyland.
16 MR. ANDREWS: 826 --
17 THE WITNESS: Thomas Boyland.
18 MR. ANDREWS: Thomas Boyland
19 Street?
20 THE WITNESS: I don't know if
21 it's street or avenue. I just know --
22 it might be street.
23 Q. Was it an apartment?
24 A. Yes.
25 Q. That was in Brooklyn?

[Page 53]

1 T. Jackson
2 A. Yes.
3 Q. How long did you reside there?
4 A. Maybe two years, three years. Maybe two
5 years.
6 Q. Was that one of the places you were
7 living when you were performing work as a
8 driver for The Fresh Diet?
9 A. Yes.
10 Q. Did you live in any other places during
11 the time you were performing deliveries as a
12 driver?
13 A. Before Brooklyn?
14 Q. Before Brooklyn.
15 A. Yonkers, New York.
16 Q. Do you remember the address there?
17 A. 12 Convert, C-O-N-V-E-R-T.
18 Q. That was in Yonkers?
19 A. Yes.
20 Q. Was that an apartment?
21 A. Yes.
22 Q. Do you remember the apartment number?
23 A. I just know it's first floor.
24 Q. Any other residences at the time you
25 were performing work as a delivery driver?

[14] (Pages 50 to 53)

[Page 54]

1 T. Jackson
2 A. I think that's it.
3 Q. Were you ever living --
4 A. I think I did live on -- I think I did
5 live on Robbin Street, I think. Yeah, I did
6 live there for a little while with my sister.
7 Q. Were you ever living in Connecticut at
8 the time you were performing work as a driver
9 for The Fresh Diet?
10 A. Yes, towards the end.
11 Q. Turning your attention to paragraph 3 of
12 Defendant's 50 --
13 A. Paragraph 3?
14 Q. 3.
15 A. On the second page?
16 Q. On the second page, yes.
17 Do you see the sentence that says "My
18 responsibilities as a driver/food delivery
19 employee for the defendants consisted
20 exclusively of showing up at The Fresh Diet's
21 Brooklyn facilities, receiving instructions as
22 to my delivery routes, obtaining prepared
23 meals, and personally delivering them to The
24 Fresh Diet's customers".
25 Do you see that sentence?

[Page 55]

1 T. Jackson
2 A. Okay. Right here (indicating). Yes.
3 Yes.
4 Q. When it says you received instructions
5 as to the delivery routes, what does that mean?
6 A. Okay. We pick up the manifest. If
7 there's any key pickups, any changes on where
8 the customers want us to leave their bags,
9 anything pertaining to the route, he -- Syed
10 would give us the information.
11 Q. Would he give it to you verbally, or was
12 it written?
13 A. Sometimes it was written, sometimes it
14 was verbally.
15 Q. If it was written, where would it be
16 located?
17 A. He would give us a piece of paper, like
18 an e-mail.
19 Q. The second sentence of that third
20 paragraph says, "After completing my meal
21 deliveries, I would have to return to The Fresh
22 Diet's Brooklyn facilities to report back,
23 complete required paperwork, and return empty
24 bags".
25 Do you see that sentence?

[Page 56]

1 T. Jackson
2 A. Yes.
3 Q. What paperwork were you required to
4 complete?
5 A. The manifest.
6 Q. When did you complete that?
7 A. Mainly, I would complete it after I
8 finished the route.
9 Q. What information would you have to
10 provide?
11 A. How many bags I brought back, how many
12 pieces of ice I brought back.
13 Q. You wouldn't do that until you finished
14 the route?
15 A. I mainly wouldn't do that until I got
16 back. I didn't really count the total until I
17 got back.
18 Q. Did you ever fill out any information on
19 the manifests?
20 A. Yes.
21 Q. What information was that?
22 A. The times, the pieces of ice, and the
23 cooler bags that I brought back.
24 Q. When you say "the times," what do you
25 mean by that?

[Page 57]

1 T. Jackson
2 A. The times that I reach each stop on my
3 manifest.
4 Q. When would you record the times?
5 A. On my manifests? The times that I got
6 there to the stops?
7 Q. Yes.
8 A. Yeah.
9 Q. Would you do that at the time that you
10 arrived at the stop or at the time that you
11 finished a stop?
12 A. I think mainly when I got there.
13 Sometimes before, sometimes after depending.
14 Q. You would handwrite a time --
15 A. Yes.
16 Q. -- that you arrived?
17 A. Yes.
18 MR. ANDREWS: Remember, let him
19 finish, and then answer.
20 Q. Did you ever hand that paperwork in to
21 anyone?
22 A. Sometimes Syed.
23 Q. Were there times that you did not hand
24 that paperwork in to Syed?
25 A. It depends on if he's there at the time

[15] (Pages 54 to 57)

[Page 58]

1 T. Jackson
2 or not.
3 Q. If he was not there, would you hand it
4 in to anyone?
5 A. No.
6 Q. What would you do with it?
7 A. Take it home with me.
8 Q. When did these requirements get
9 implemented?
10 A. Which ones?
11 Q. To return to the facility, to report
12 back, complete required paperwork, and return
13 empty bags.
14 A. I don't have a specific date.
15 Q. This wasn't until after they were at
16 Siegel Street?
17 A. Yes.
18 Q. Looking at paragraph 6, it says,
19 "Throughout my employment, I often worked
20 significantly in excess of forty hours a week,
21 yet was never paid overtime compensation of one
22 and half times my regular rate of pay".
23 Do you see that?
24 A. Yes.
25 Q. What do you mean by that statement?

[Page 59]

1 T. Jackson
2 A. Meaning I did more than forty hours a
3 week, and I never got paid for the overtime.
4 Q. You were paid for mileage and stops,
5 correct?
6 A. Yes.
7 Q. How many hours did you work?
8 MR. ANDREWS: Objection.
9 A. I really don't know. On a week,
10 anywhere from sixty to eighty maybe.
11 Q. How would you come up with that number?
12 A. Sometimes, like I said, we would come in
13 and have to help bag, put on bag ties, separate
14 the food, sort out the food, whatever needed to
15 be done that day. Sometimes, you know, the
16 food wasn't ready. Sometimes everything was
17 not bagged. Different things. Sometimes they
18 didn't have ice, they had to run out and get
19 ice. Sometimes they didn't have enough bags.
20 Depending on what was going on that day.
21 Q. Were there ever times that the food was
22 ready and packed in a meal bag with a bag tie
23 for you to simply deliver?
24 A. Yeah, there was.
25 Q. When The Fresh Diet was located at the

[Page 60]

1 T. Jackson
2 Siegel Street location, what times would you
3 arrive at the facility?
4 MR. ANDREWS: Objection.
5 A. At Siegel?
6 Q. At Siegel.
7 A. Anywhere between 3:00 and 6:00 until we
8 got a regular schedule.
9 Q. When you got a regular schedule, what
10 time were you showing up to the facility?
11 A. If I'm not mistaken, I think my time was
12 between 6:00 or 6:30, something like that.
13 Q. Do you remember when that schedule was
14 implemented?
15 A. No, I don't remember.
16 Q. After the schedule was implemented,
17 would you show up between 6:00 and 6:30 every
18 night?
19 MR. ANDREWS: Objection.
20 A. Yes, pretty much.
21 Q. You would never show up later?
22 A. No. I don't believe so, no.
23 Q. Do you know if other drivers showed up
24 later?
25 A. Everybody had their different times to

[Page 61]

1 T. Jackson
2 be there.
3 Q. Do you know if any drivers were
4 scheduled to come in later than 6:30 p.m.?
5 A. Yeah, there were drivers that were
6 scheduled later than me. Yes.
7 Q. Do you know the names of any of those
8 drivers?
9 A. No, I can't tell you that.
10 Q. After the schedule was implemented, what
11 was the earliest you would begin performing
12 deliveries?
13 MR. ANDREWS: Objection.
14 A. The actual deliveries?
15 Q. The actual deliveries.
16 A. That varies.
17 Q. The earliest.
18 A. Maybe 6:30, 7:00.
19 Q. What about the latest?
20 A. That varies.
21 Q. What could be the latest that it would
22 be?
23 A. What could be the latest?
24 Q. What was the latest it would be?
25 A. For me, 2:00 in the morning.

[16] (Pages 58 to 61)

[Page 62]

1 T. Jackson
 2 Q. You would start?
 3 A. I started at 2:00 in the morning.
 4 Q. When you started at 2:00 in the morning,
 5 do you remember how many times that happened?
 6 A. That happened once.
 7 Q. Other than that one occasion, would you
 8 ever show up at 1:00 in the morning?
 9 A. No.
 10 Q. Midnight?
 11 A. No. Show up to pick up my bags? No.
 12 Q. What was the latest, other than that one
 13 occasion, that you would start performing
 14 deliveries?
 15 MR. ANDREWS: Objection.
 16 A. That varies. 10:00, 9:00. It depends
 17 on what needed to be done that day.
 18 Q. 10:00 p.m. or 9:00 p.m.?
 19 A. Yeah.
 20 Q. What was the earliest you would be done
 21 with your deliveries?
 22 A. Earliest?
 23 Q. Now we're focused on the Siegel Street
 24 location.
 25 A. The earliest? The earliest, maybe 3:00

[Page 63]

1 T. Jackson
 2 or 4:00 depending on how many stops and miles I
 3 have for the night.
 4 Q. What about the latest?
 5 A. Anywhere from 5:00 to 6:00 in the
 6 morning.
 7 Q. Did you have a regular last stop when
 8 you were performing deliveries from the
 9 Siegel Street location?
 10 A. Not really, depends on who's on for the
 11 night. The -- the manifest changes, so, you
 12 know, depends on who I deliver to that night,
 13 that particular night. So it varies.
 14 Q. Were the hours the same at the
 15 Baltic Street location?
 16 A. Pretty much, yeah.
 17 Q. Looking at paragraph 7 of
 18 Defendant's 50, it says, "During my employment
 19 with the defendants, I interacted with other
 20 drivers/food delivery employees on a daily
 21 basis, and know that my own experiences were
 22 typical of how these employees were supervised
 23 and compensated".
 24 Do you see that sentence?
 25 A. Yes.

[Page 64]

1 T. Jackson
 2 Q. What other drivers are you referring to
 3 in that paragraph?
 4 A. My nephew, my sister, David, Kenneth,
 5 and other people.
 6 Q. When you say --
 7 A. Bryant, Fernando. There's more. I
 8 don't remember everybody.
 9 Q. How do you know that your own
 10 experiences were typical of how the other
 11 employees were supervised and compensated?
 12 A. We pretty much all did the same thing.
 13 If we came in and the bags wasn't ready, we
 14 pitched in and helped pack it and put bag ties
 15 on. Whatever needed to be done that day, we
 16 did.
 17 Q. Do you know the routes that everybody
 18 else drove?
 19 A. There were different routes for
 20 different people, so I don't -- I don't know
 21 who drove what at what time.
 22 Q. Did you know how long it took anyone
 23 else to complete their route?
 24 A. I really don't know that.
 25 Q. Did you ever show up late after the

[Page 65]

1 T. Jackson
 2 schedule was implemented?
 3 MR. ANDREWS: Objection.
 4 A. I don't think so.
 5 Q. Did you ever take any vacation
 6 between --
 7 A. No.
 8 MR. ANDREWS: Let him finish.
 9 Q. -- 2007 and 2011?
 10 A. No, never took a vacation.
 11 Q. Did you ever take a sick day?
 12 A. Did I ever take a sick day?
 13 Q. Were you ever sick during 2007 --
 14 A. Yes, I was.
 15 Q. If you were sick, did you perform
 16 deliveries that night?
 17 A. Sometimes.
 18 Q. Were there times that you did not
 19 perform deliveries because you were sick?
 20 A. Depends on what the problem was.
 21 Q. Was there ever a time that you did not
 22 show up to work to perform deliveries?
 23 A. One night I didn't show up because I had
 24 burnt my leg, so I had to call and tell him
 25 that I burnt my leg so I could go to the

[17] (Pages 62 to 65)

[Page 66]

1 T. Jackson
 2 emergency room and get that taken care of.
 3 Another time, I sprained my foot, so I had to
 4 go to the emergency room, get that taken care
 5 of. When I found out my mother had breast
 6 cancer, the day she had surgery.
 7 Q. Did you use your own car when you
 8 performed deliveries?
 9 A. Yes, I did.
 10 Q. What car did you have in 2007?
 11 A. At that time, I think I had a Sable, I
 12 think.
 13 Q. What's that?
 14 A. Sable.
 15 Q. What --
 16 A. Is it a Mercury Sable? Mercury Sable.
 17 I think that's the name of it.
 18 Q. Did you have different cars between --
 19 A. Yes, I did.
 20 Q. How many different cars?
 21 A. I had a Mercury Sable, and then I had a
 22 van that was a -- I forgot what kind of van it
 23 was. It was red. I forgot. And then I had a
 24 Ford Windstar, which is the van that I have
 25 now.

[Page 67]

1 T. Jackson
 2 Q. Did you have --
 3 A. It was three cars in all.
 4 Q. Did you own those cars?
 5 A. Yes, they were mine.
 6 Q. Do you have insurance for the cars?
 7 A. Yes, I do.
 8 Q. Who paid for the insurance?
 9 A. I did.
 10 (Whereupon, Manifests were
 11 marked as Defendant's Exhibit 51, for
 12 identification, as of this date.)
 13 (Whereupon, a recess was taken
 14 at this time.)
 15 Q. I'm now going to show you a document
 16 that's been marked as Defendant's Exhibit 51,
 17 which are Bate stamp numbered FD003415 to
 18 FD004192, and they've been represented to us as
 19 documents that set forth the number of hours
 20 you worked to support your claims in the
 21 complaint, and I'm going to ask you if you've
 22 seen those documents before today (handing).
 23 MR. ANDREWS: Objection.
 24 A. Yes.
 25 Q. Does your handwriting appear on any of

[Page 68]

1 T. Jackson
 2 those documents?
 3 A. Yes.
 4 MR. ANDREWS: You can take the
 5 rubber band off if you want.
 6 Q. You said yes?
 7 A. Yes.
 8 Q. Wherever the handwriting appears, is it
 9 your handwriting?
 10 I'm going to ask you to take your time.
 11 A. Some of them, yes. Some of them, no.
 12 MR. ANDREWS: If you need to
 13 take time, that's a lot of paper, so
 14 don't rush.
 15 Q. I'm going to need you to tell me --
 16 A. Which ones are mine?
 17 Q. -- which ones have your handwriting.
 18 You can see it's double-sided, so take
 19 your time.
 20 A. This one looks like my handwriting
 21 (indicating).
 22 MR. ANDREWS: Why don't you read
 23 the number? Can you read that number?
 24 THE WITNESS: Yes.
 25 A. It's FD003468.

[Page 69]

1 T. Jackson
 2 Q. For that document, you say it may
 3 contain your handwriting?
 4 A. It looks like my handwriting. Yes, I
 5 think this is my handwriting.
 6 MR. ANDREWS: Speak up so she
 7 can record all of this.
 8 A. It looks like -- that one looks like my
 9 handwriting.
 10 Q. You're referring to FD003468?
 11 A. Yes.
 12 Q. Is it your handwriting on 003469?
 13 A. 3469? 69? What did you say, 003479?
 14 Q. No, 69.
 15 MR. ANDREWS: Here, this page
 16 (handing).
 17 A. It looks like my handwriting.
 18 Q. Do you know if it's your handwriting?
 19 A. I really can't say for sure. It looks
 20 like it though. It looks like it.
 21 MR. ANDREWS: Just for the
 22 record, she's reading from FD003470.
 23 It's just the opposite page of that.
 24 A. That looks like my handwriting
 25 (indicating).

[18] (Pages 66 to 69)

[Page 70]

1 T. Jackson
2 Q. You're referring to FD003479?
3 A. This one is FD003479?
4 Q. That is your handwriting?
5 A. Yes, it looks like that. Yeah, it looks
6 like that's mine.
7 That looks like my handwriting
8 (indicating). This is FD003481.
9 Q. What about on 3482?
10 A. Yes, that looks like my handwriting
11 also.
12 Q. Let's take a quick second and look at
13 FD003481 to 003482.
14 A. Okay.
15 Q. Is that a sample of a manifest you were
16 referring to earlier in your --
17 A. Yes.
18 Q. -- deposition?
19 A. Yes.
20 Q. Does that contain the time you were
21 referring to that you would insert on a
22 manifest?
23 A. Yes.
24 Q. That indicates the time you would have
25 made a drop-off for that particular customer?

[Page 71]

1 T. Jackson
2 A. Yeah.
3 Q. Do you see that it says "May 24, 2010"?
4 A. Yes.
5 Q. There are nineteen stops for that route
6 for that --
7 A. For that day, yes.
8 Q. -- day, right?
9 What time does it indicate?
10 Go ahead. Take your time.
11 A. This looks like eighteen stops. This
12 looks like eighteen stops.
13 Q. That's a sample of a manifest you would
14 receive?
15 A. Yes.
16 Q. Would that be a complete route for the
17 night of May 24, 2010?
18 A. Yes.
19 Q. Does that indicate the time you would
20 have made your first delivery?
21 A. Yes.
22 Q. What time is that?
23 A. 10:19.
24 Q. Is that what you're referring to on the
25 first row on the document FD003481?

[Page 72]

1 T. Jackson
2 A. Yes, it's the first stop.
3 Q. 10:19 p.m.?
4 A. Yes.
5 Q. On the following page, being 3482, does
6 that indicate the time of the last stop?
7 A. Yes.
8 Q. What time is that?
9 A. Oh, actually not. I didn't do this one.
10 Q. Meaning you didn't do the --
11 A. I didn't -- I performed it, but I must
12 have forgotten to put in the time.
13 Q. The time before that for the last stop
14 says 3:25.
15 A. Yes.
16 Q. Is that a.m.?
17 A. A.m., yes.
18 Q. The first delivery was made at
19 10:19 p.m.?
20 A. The first delivery, yes.
21 Q. The second to last --
22 A. That's not when I started though.
23 Q. The first delivery was made at 10:19 --
24 A. The first delivery.
25 Q. -- p.m.?

[Page 73]

1 T. Jackson
2 A. Yes.
3 Q. Do you know how far Bloomfield,
4 Connecticut is from the Brooklyn facility?
5 A. If I had to guess, I would say two, two
6 and a half hours.
7 Q. Do you know if Fresh Diet was located in
8 Siegel Street --
9 A. At this time?
10 Q. -- on May 24, 2010?
11 MR. ANDREWS: Wait. Let him
12 finish.
13 A. I don't know.
14 Q. It may have been in Connecticut at that
15 time?
16 MR. ANDREWS: Objection.
17 A. I don't think so. I think we were in
18 Brooklyn at this time, 2010. I think we were
19 in Brooklyn at the time.
20 Q. Getting back to when the last delivery
21 was completed, you say that the last one is
22 blank, correct?
23 A. Yes.
24 Q. The one before that was done at
25 3:25 a.m.?

[19] (Pages 70 to 73)

[Page 74]

1 T. Jackson
2 A. Yes.
3 Q. That was in Norwalk, Connecticut?
4 A. Norwalk, yes.
5 Q. Do you know how far Norwalk, Connecticut
6 was from the Brooklyn facility?
7 A. Anywhere from an hour to an hour and a
8 half.
9 Q. Just moving on in Defendant's 51, I just
10 want to get to the next set where you recognize
11 that it's definitely your handwriting.
12 A. This is my handwriting (indicating).
13 Q. Now we're referring to FD003483?
14 A. Yes.
15 Q. Is that your handwriting on FD003484?
16 A. Yes.
17 Q. Does this indicate your manifest for
18 May 23, 2010?
19 A. Yes.
20 Q. On the first row, do you see where it
21 says "9:21"?
22 A. Yes.
23 Q. Does that mean that the first delivery
24 you made --
25 A. Was at 9:21.

[Page 75]

1 T. Jackson
2 Q. P.m.?
3 A. Yes.
4 Q. That was in Rocky Hill, Connecticut?
5 A. Yes.
6 Q. Do you know how far Rocky Hill,
7 Connecticut is from the Brooklyn facility?
8 A. About two hours.
9 Q. Looking at FD003484, does that last row
10 indicate the last stop you would have made for
11 the May 23, 2010 route?
12 A. Yes.
13 Q. What time does that say?
14 A. 2:40.
15 Q. Is that 2:40 a.m.?
16 A. Yes.
17 Q. If you could, just keep looking for the
18 next set where you definitively recognize your
19 handwriting.
20 A. This one looks like my handwriting here,
21 this one (indicating).
22 Q. Now we're referring to --
23 A. FD003487.
24 Q. Is your handwriting also on FD003488?
25 A. Yes.

[Page 76]

1 T. Jackson
2 Q. Looking at FD003487, is that a route
3 your received for May 14, 2010?
4 A. Yes.
5 Q. For eleven stops?
6 A. Yes.
7 Q. What time does it say the first delivery
8 was made?
9 A. At 10:28 p.m.
10 Q. What time does it say the last delivery
11 was made?
12 A. No, this is not right.
13 Q. Looking at 003487, is that a complete
14 manifest for one night?
15 A. Okay. Which one?
16 Q. 3487.
17 A. I don't think this is a complete -- I
18 don't think so.
19 Q. How many stops are indicated?
20 A. It says eleven stops here. It says
21 eleven.
22 Q. How many customers are listed on that
23 one sheet, being FD003487?
24 MR. ANDREWS: Objection.
25 A. One, two, three, four, five, six, even,

[Page 77]

1 T. Jackson
2 eight, nine, ten, eleven on this one.
3 Q. What time does it say that the drop-off
4 was for the last customer listed on that page?
5 MR. ANDREWS: Objection.
6 A. On this page, 1:52 a.m.
7 Q. You said that you also recognized your
8 handwriting on the document FD003488?
9 A. Yes.
10 Q. Do you recognize your handwriting on
11 FD003489?
12 A. Yes.
13 Q. This page (indicating).
14 A. Oh, I'm sorry. On this one, yes.
15 Q. That's your handwriting?
16 A. Yes.
17 Okay. So this is part of this one
18 (indicating).
19 Q. Is 003488 to 003489 a manifest you would
20 have received for May 16, 2010?
21 MR. ANDREWS: Objection.
22 A. Yes.
23 Q. Is that a complete manifest you would
24 have received for that night?
25 MR. ANDREWS: Objection.

[20] (Pages 74 to 77)

[Page 78]

1 T. Jackson
 2 A. Yes.
 3 Q. Now you're looking at FD003490?
 4 A. Yes.
 5 Q. Is the complete manifest for
 6 May 16, 2010 contained on FD003488 through
 7 003490?
 8 A. Yes.
 9 Q. What time does it indicate the first
 10 drop-off was made?
 11 A. 8:48 a.m. P.m. Sorry. P.m.
 12 Q. What time does it indicate that the last
 13 delivery was made?
 14 A. 2:25. Yeah, 2:25 a.m.
 15 Q. That last stop was in Darien,
 16 Connecticut?
 17 A. Yes. No. No. The last stop would have
 18 been New Canaan it looks like. It looks like
 19 New Canaan.
 20 Q. What time is it at New Canaan?
 21 A. 2:42.
 22 Q. A.m.?
 23 A. 2:42 a.m.
 24 Q. Is there a reason the New Canaan was the
 25 last stop as opposed to Darien, Connecticut on

[Page 79]

1 T. Jackson
 2 that night?
 3 MR. ANDREWS: Objection.
 4 A. If I'm not mistaken, I think New Canaan
 5 is before -- New Canaan is between -- if I'm
 6 not mistaken, New Canaan would be between --
 7 okay. I think maybe I did a mistake here.
 8 Maybe that was supposed to be a one
 9 (indicating). Maybe that was supposed to be a
 10 one.
 11 MR. ANDREWS: Read the page
 12 number.
 13 A. The page number is FD003489. I think I
 14 might have made a mistake and put a two, and it
 15 was supposed to be a one.
 16 Q. Meaning 1:42 a.m.?
 17 A. Yes.
 18 Q. Getting back to when the last stop would
 19 have been made for the May 16, 2010 route, what
 20 time would that have been?
 21 MR. ANDREWS: Objection.
 22 A. 2:25 a.m.
 23 Q. In Darien, Connecticut?
 24 A. Yes.
 25 This one looks like my handwriting

[Page 80]

1 T. Jackson
 2 (indicating).
 3 MR. ANDREWS: Make sure you read
 4 the page numbers when you identify
 5 documents.
 6 A. It's FD003491 and FD003492.
 7 Q. Looking at 3491, does that indicate what
 8 the first stop would have been for the
 9 May 17, 2010 route?
 10 A. Yes.
 11 Q. What time was that?
 12 A. 10:20.
 13 Q. P.m.?
 14 A. Uh-huh.
 15 Q. Does that indicate when the last --
 16 A. Yes.
 17 Q. -- delivery was made?
 18 What time was that?
 19 A. 4:09 a.m.
 20 Q. Is that in Darien, Connecticut?
 21 A. Yes.
 22 I think it might have been -- I think I
 23 might have did more stops than this because for
 24 some reason I put twenty-nine up there
 25 (indicating).

[Page 81]

1 T. Jackson
 2 MR. ANDREWS: Read the page
 3 number.
 4 A. FD003491. I think I might have done
 5 more stops than what it's saying on here, the
 6 twenty-three, because I got a twenty-nine there
 7 (indicating). So I think I might have did
 8 twenty-nine stops that day instead of
 9 twenty-three. I just don't know where the rest
 10 of the manifest is.
 11 Q. There's nothing indicating when the
 12 other stops would have been other than what's
 13 on the manifest, correct?
 14 MR. ANDREWS: Objection.
 15 A. There must be another part, so --
 16 Q. Let's go ahead and just --
 17 A. This one would be the same thing
 18 (indicating). This is FD003493. I think this
 19 might have been more stops also because I got a
 20 thirty-two in the corner.
 21 Q. Is that your handwriting on FD003493?
 22 A. Yes, that's my handwriting.
 23 Q. 3494?
 24 A. Yes.
 25 Q. And 3495?

[21] (Pages 78 to 81)

[Page 82]

1 T. Jackson
2 A. Yes.
3 These two are together (indicating).
4 Q. Is that your handwriting on 3497?
5 A. No, but this does look like my husband's
6 handwriting.
7 Q. Who is your husband?
8 A. Delroy McNeil.
9 Q. He performed --
10 A. No. Sometimes he would go with me.
11 Q. He would go with you?
12 A. Yes.
13 Q. He would fill out the manifest?
14 MR. ANDREWS: Objection.
15 A. Yes. It looks like he filled this one
16 out for me.
17 Q. Would he ever take any of the meals to
18 the doors when he was with you?
19 A. Yes, sometimes he did.
20 Q. How often did he go with you?
21 A. I can't really answer that.
22 Q. Every week?
23 Would he go with you once a night?
24 MR. ANDREWS: Objection.
25 A. No, more than that.

[Page 83]

1 T. Jackson
2 Q. More than that?
3 A. Uh-huh.
4 Q. Three nights a week?
5 MR. ANDREWS: Objection.
6 A. I can't be specifically sure how many
7 nights.
8 Q. Would he be with you the entire time?
9 MR. ANDREWS: Objection.
10 A. Of the route?
11 Q. Yes.
12 A. The entire time that I'm on the route?
13 Q. Yes.
14 A. Yes.
15 Q. Did he go to the facility with you?
16 A. Yes.
17 Q. Did Syed ever see him?
18 A. Yes.
19 Q. Did Syed ever tell you you can't have
20 your husband --
21 A. No.
22 Q. -- performing deliveries with you?
23 A. No.
24 Q. Did anyone else ever go with you?
25 A. I don't remember. I don't think so.

[Page 84]

1 T. Jackson
2 Q. Did your daughter ever go?
3 A. With me? No. No, I don't think she
4 ever went with me.
5 Q. You recognize that to, perhaps, be your
6 husband's handwriting?
7 A. Yes.
8 Q. We're looking at 3497?
9 A. Yes.
10 Q. Do you recognize that on 3498?
11 A. Yes.
12 Q. Do you recognize the handwriting on
13 3499?
14 A. Yes, that also looks like my husband's
15 writing, and on 3500.
16 MR. ANDREWS: FD003500.
17 A. This looks like his handwriting on
18 FD003501.
19 Do you want me to keep going?
20 Q. Let's just skip a few here.
21 MR. ANDREWS: You want to skip a
22 whole bunch?
23 MR. POLLACK: Yes.
24 Q. Just getting back where you recognized
25 your handwriting and the time entry on that

[Page 85]

1 T. Jackson
2 manifest, that would indicate the first
3 delivery made, correct?
4 A. Yes.
5 Q. The last entry would indicate the last
6 delivery made?
7 A. Yes.
8 MR. ANDREWS: Objection.
9 Q. The time of the last delivery made,
10 correct?
11 MR. ANDREWS: Objection.
12 A. Yes, pretty much.
13 Q. Do you recognize your handwriting on --
14 A. On this one? Yes.
15 Q. -- on 3723?
16 A. Yes.
17 Q. Is that your handwriting on 3729?
18 A. Yes.
19 Q. Do you recognize your handwriting on
20 3752?
21 A. Yes.
22 Q. Do you recognize your handwriting on
23 3753?
24 A. Yes.
25 Q. Do you know if 3752 to 3753 represents

[22] (Pages 82 to 85)

[Page 86]

1 T. Jackson
 2 one route for November 28, 2010?
 3 A. I don't know.
 4 Q. Do you see that it says seventeen stops?
 5 A. Yes.
 6 Q. On 3752, correct, it says seventeen
 7 stops?
 8 A. Yes, this says seventeen stops
 9 (indicating).
 10 Q. On 3753, there's a handwritten notation
 11 saying sixteen.
 12 Do you see that?
 13 A. Yes.
 14 Q. Do you know what that would mean?
 15 A. I don't remember.
 16 Q. If you see --
 17 A. Maybe that -- maybe it was -- I think it
 18 was sixteen stops because this is crossed out
 19 (indicating).
 20 Q. You're referring to the ninth row on
 21 3752?
 22 A. Yeah.
 23 I'm not sure if this is part of that or
 24 not (indicating). This doesn't have a date on
 25 it.

[Page 87]

1 T. Jackson
 2 Q. Fair enough.
 3 Starting on 3755, can you just flip
 4 through the document and let me know when you
 5 see your handwriting and a complete delivery
 6 route for a given day?
 7 MR. ANDREWS: Objection.
 8 A. Could you repeat that?
 9 Q. Starting on this page --
 10 A. Right.
 11 Q. -- which is 3755 --
 12 A. Yes.
 13 Q. -- I want you to go through it until you
 14 see your handwriting and a complete route for a
 15 given night.
 16 MR. ANDREWS: Objection.
 17 A. This looks -- this is my handwriting
 18 but -- this is FD003757, but I got the number
 19 twenty-one. There's a number twenty-one up
 20 here, so I don't (indicating) -- I don't
 21 remember if it was twenty-one stops or if it
 22 was seventeen stops.
 23 Q. Let's move on.
 24 A. That's my handwriting (indicating).
 25 Q. You're referring to 3769?

[Page 88]

1 T. Jackson
 2 A. 3769, yes. Yes, this is my handwriting.
 3 This is my handwriting, but it doesn't
 4 look like a full route (indicating).
 5 MR. ANDREWS: You have to speak
 6 up and identify the page numbers.
 7 A. FD003776 and FD003775 looks like my
 8 handwriting.
 9 Q. Do you know if 3775 and 3776 make up one
 10 route?
 11 A. No. No. Actually, this would be the
 12 back of this one (indicating). Okay. This
 13 would be the back, I think, of this one
 14 (indicating).
 15 Q. Do you believe that 3776 to 3777 is one
 16 route?
 17 MR. ANDREWS: Objection.
 18 A. No, I don't think so. I don't think so.
 19 They have the same stops here as the same stops
 20 here (indicating).
 21 Q. Did you give these to your attorney?
 22 A. Yes, I did.
 23 Q. Where do you have them?
 24 A. The originals?
 25 Q. Yes.

[Page 89]

1 T. Jackson
 2 A. The originals, my attorney has.
 3 Q. You gave them to your attorney you
 4 said --
 5 A. Yes.
 6 Q. -- correct?
 7 A. Uh-huh.
 8 Q. Do you have a hard copy of them, or are
 9 they on a computer?
 10 A. No. I have the actual -- well, my
 11 lawyer has the actual manifests.
 12 Q. You gave them all to your lawyer?
 13 A. Yes, all the ones that I had.
 14 Q. Did you explain what they were?
 15 A. Yeah. I told him they were my
 16 manifests.
 17 Q. Looking at 3777, do you see where it
 18 says "January 9, 2011"?
 19 A. Right.
 20 Q. And 3775 shows January 10, 2011.
 21 Do you see that?
 22 A. Yes.
 23 Q. These are two different manifests,
 24 correct?
 25 A. It looks like it, yes.

[23] (Pages 86 to 89)

[Page 90]

1 T. Jackson
 2 Q. Do you know if 3776 is the other part of
 3 one of those two manifests?
 4 MR. ANDREWS: Objection.
 5 A. I think this is a whole different
 6 manifest because it has the same stops, see,
 7 35 Overhill Road (indicating).
 8 Q. Is on 377 --
 9 A. Oh. Wait. Wait. Wait.
 10 MR. ANDREWS: Make sure you read
 11 what page number. Otherwise, we'll
 12 never understand what page you're
 13 referring to.
 14 THE WITNESS: Okay.
 15 A. FD003777.
 16 Q. That's the beginning part of a route for
 17 January 9 --
 18 A. Right.
 19 Q. -- 2011, correct?
 20 A. Right.
 21 Q. Do you know --
 22 A. It looks like the beginning. Let me
 23 change that. It looks like the beginning.
 24 Q. It says fourteen stops, correct?
 25 A. Yes.

[Page 91]

1 T. Jackson
 2 Q. Are fourteen stops contained on that one
 3 page?
 4 A. One, two, three, four, five, six, seven,
 5 eight, nine, ten. No. That says ten.
 6 This is different because it has the
 7 same stops here on FD003776 as they do on
 8 FD003777 (indicating). See on --
 9 Q. On 3776?
 10 A. Yes, are on --
 11 Q. 3777 --
 12 A. Yes.
 13 Q. -- the same addresses?
 14 A. So I think that's two different
 15 manifests.
 16 Q. I'm not going to ask you to guess.
 17 Again, just trying to go through when
 18 you could see a completed route between one,
 19 two, or three pages for the next night that
 20 contains your handwriting or your husband's
 21 handwriting.
 22 A. FD003783 and FD003782 looks like it's a
 23 complete manifest.
 24 Q. Is that for the November 16, 2010 route?
 25 A. Yes.

[Page 92]

1 T. Jackson
 2 Q. When would the first delivery have been
 3 made on that route?
 4 A. Looks like 8:12.
 5 Q. P.m.?
 6 A. P.m., yes.
 7 Q. When was the last delivery?
 8 MR. ANDREWS: Objection.
 9 A. Looks like 3:54 a.m.
 10 MR. ANDREWS: We should take a
 11 short break. It doesn't have to be this
 12 second, but we've been going for over an
 13 hour.
 14 THE WITNESS: Okay.
 15 Q. On 3782 to 3783, the deliveries are put
 16 in a certain order; is that correct?
 17 A. This is the order that they gave it to
 18 me in, that Syed gave it to me in.
 19 Q. Did you follow that order?
 20 A. Not on this one.
 21 Q. Did you tell Syed that you changed the
 22 order in which you delivered the meals that
 23 night?
 24 MR. ANDREWS: Objection.
 25 A. Any time he didn't put it in the correct

[Page 93]

1 T. Jackson
 2 order, yes.
 3 Q. What do you mean?
 4 A. Meaning -- meaning I would usually start
 5 from the furthest stop and work my way down to
 6 the closest stop. So this looks like he got it
 7 all mixed up. It's not -- it's not in the
 8 order that it's normally done in.
 9 Q. From furthest away to closest --
 10 A. Right.
 11 Q. -- to the Brooklyn facility?
 12 A. Right.
 13 Q. You decided the order in which you were
 14 to deliver them?
 15 MR. ANDREWS: Objection.
 16 A. It's -- usually, it's in correct order
 17 when I get my manifest from him. It's usually
 18 the furthest city from the Brooklyn kitchen,
 19 and I work my way back down to the Brooklyn
 20 kitchen.
 21 So it looks like the furthest one on
 22 here was -- furthest one here looks like it
 23 could have been the Glastonbury stop, I think
 24 (indicating).
 25 Q. You're looking on 3783?

[24] (Pages 90 to 93)

[Page 94]

1 T. Jackson
2 A. Yeah, this is 3783.
3 I don't know what happened here. Okay.
4 It looks like -- okay.
5 Q. I'll ask this.
6 If you ever didn't deliver in the order
7 that it was contained on the manifest, did you
8 have to tell Syed?
9 A. Yes.
10 Q. What would you tell him?
11 A. If it wasn't in the order that it's
12 normally done in, I would let him know.
13 Q. You would let him know?
14 A. Yeah.
15 Q. What would you let him know?
16 A. I would tell him that it's not in its
17 correct order.
18 Q. What would he say?
19 MR. ANDREWS: Objection.
20 A. I don't know.
21 Q. Did he tell you that you have to do it
22 on the order that it's on the manifest?
23 MR. ANDREWS: Objection.
24 A. No, he didn't tell me that I had to do
25 it on this order because he didn't really know

[Page 95]

1 T. Jackson
2 Connecticut the way I did.
3 Q. You were able to decide where to --
4 A. Put it in the correct order.
5 Q. You were able to make that decision?
6 MR. ANDREWS: Objection.
7 A. Yes.
8 Q. Did that happen on more than one
9 occasion?
10 A. Depending on a manifest. I don't know
11 how they -- the manifest wasn't always in its
12 correct order. Sometimes it was, sometimes it
13 wasn't.
14 MR. POLLACK: Why don't we take
15 a break?
16 (Whereupon, a recess was taken
17 at this time.)
18 Q. Is that your handwriting on the document
19 FD003854?
20 A. Yes.
21 Q. Is that your handwriting on the back of
22 the page on 3855?
23 A. Yes.
24 Q. Does 3854 to 3855 represent one route?
25 A. Yes.

[Page 96]

1 T. Jackson
2 Q. Is that a route for April 12, 2010?
3 A. Yes.
4 Q. What time does it indicate that the
5 first delivery was dropped off?
6 A. The first delivery was at 8:06.
7 Q. P.m.?
8 A. P.m.
9 Q. That was in North Brunswick, New Jersey?
10 A. Yes.
11 Q. What time does it indicate the last
12 delivery was made?
13 A. Staten Island at 1:14.
14 Q. A.m.?
15 A. A.m., yes.
16 Q. That's the second to last row?
17 A. Yes.
18 Q. Again, does this indicate that you went
19 out of order between the last two stops?
20 A. Yes.
21 Q. Did you make that decision on your own?
22 MR. ANDREWS: Objection.
23 A. I don't remember. I don't recall this
24 one.
25 Q. If you ever went out of the order on the

[Page 97]

1 T. Jackson
2 manifest, were you disciplined by Syed Hussain?
3 MR. ANDREWS: Objection.
4 A. If I ever went out of order? If I ever
5 went out of order, he would know.
6 Q. He wouldn't know?
7 MR. ANDREWS: He would know is
8 what she said.
9 Q. He would know?
10 A. He would know, yeah.
11 Q. He would know?
12 A. He would know.
13 Q. Were you ever disciplined if you went
14 out of order?
15 MR. ANDREWS: Objection.
16 A. No. I don't recall that. No.
17 Q. How would he know that you went out of
18 the order?
19 A. How would he know that I went out of
20 order?
21 Q. Yes.
22 A. I'm trying to figure out what happened
23 that day that I did that.
24 MR. ANDREWS: Mr. Pollack has
25 asked you a question. You don't need to

[25] (Pages 94 to 97)

[Page 98]

1 T. Jackson
 2 look at this document to answer it.
 3 A. Can you repeat that?
 4 MR. POLLACK: Can you repeat it?
 5 (Whereupon, the record was read
 6 by the reporter.)
 7 A. How would he know if I went out of the
 8 order? If I had to go out of the order, then I
 9 would -- I don't know that right now. I don't
 10 know.
 11 Q. Would you call him and tell him that
 12 you're going out of the order on a manifest?
 13 MR. ANDREWS: Objection.
 14 A. Sometimes. It depends on whatever
 15 problem was that night.
 16 I mean, there was times where we had bad
 17 weather, maybe -- you know, the situation
 18 changes from day to day, you know. It depends
 19 on what the weather is like, if he takes
 20 something off the manifest, if he puts
 21 something on the manifest. Depends on, you
 22 know, the situation for that night, that
 23 particular day.
 24 Q. Were there times where you did not tell
 25 him that you went out of order until after you

[Page 99]

1 T. Jackson
 2 had completed the route?
 3 MR. ANDREWS: Objection.
 4 A. Were there times? I don't remember.
 5 Probably so.
 6 Q. Did you take any breaks during the time
 7 you performed deliveries?
 8 A. Did I take any breaks? I might have
 9 stopped and got coffee or something to eat.
 10 Q. Would you take a break for any other
 11 reason?
 12 A. To go to the bathroom --
 13 Q. To get gas?
 14 A. -- get coffee.
 15 Yeah, gas, get something to eat,
 16 something to snack on.
 17 Q. Did you ever go into a restaurant to
 18 eat?
 19 A. To sit down and eat?
 20 Q. Yes.
 21 A. No.
 22 Q. Would you ever call Syed to tell him
 23 that you were going to get something to eat?
 24 A. No.
 25 Q. Would you call him and tell him you were

[Page 100]

1 T. Jackson
 2 going to get gas?
 3 A. No.
 4 Q. You wouldn't call him if you were taking
 5 a break during the time you were performing
 6 deliveries?
 7 MR. ANDREWS: Objection.
 8 A. If I was going for something to eat or
 9 going for gas or going to the bathroom, no.
 10 Q. Did you ever seek reimbursement for any
 11 expenses you incurred during the time you were
 12 performing deliveries?
 13 A. The only reimbursement that we got was
 14 our tolls.
 15 Q. Did you have any other source of income
 16 between 2007 and 2011 besides the payments you
 17 received for the work you performed as a driver
 18 for The Fresh Diet?
 19 A. When I worked at PCF, which was at the
 20 beginning of me starting with Fresh Diet.
 21 Q. Any other times?
 22 A. Not that I can recall.
 23 Q. Were taxes ever withheld from your
 24 payments from Late Night?
 25 A. Was taxes ever taken out of my check?

[Page 101]

1 T. Jackson
 2 Q. Yes.
 3 A. No, they were never taken out of my
 4 check. I got a 1099.
 5 Q. You got a 1099?
 6 A. Yes.
 7 (Whereupon, 2010 1099 form was
 8 marked as Defendant's Exhibit 52, for
 9 identification, as of this date.)
 10 (Whereupon, 2010 1099 form was
 11 marked as Defendant's Exhibit 53, for
 12 identification, as of this date.)
 13 (Whereupon, 2011 1099 form was
 14 marked as Defendant's Exhibit 54, for
 15 identification, as of this date.)
 16 Q. I'm now showing you what's been marked
 17 for identification as Defendant's Exhibit 52
 18 (handing).
 19 Is that a copy of a 1099 you would have
 20 received?
 21 A. The top one is mine (indicating).
 22 Q. The top one?
 23 A. Yes.
 24 Q. Does that reflect the compensation you
 25 received from Late Night for the year 2010?

[26] (Pages 98 to 101)

[Page 102]

1 T. Jackson
 2 MR. ANDREWS: Objection.
 3 A. The tolls is in here. The tolls that we
 4 were reimbursed from is in this figure
 5 (indicating).
 6 Q. Do you see the sum, \$64,300?
 7 A. Yes. Tolls were included.
 8 Q. Is it your testimony that you received
 9 less than that for the deliveries you
 10 performed?
 11 A. Yes.
 12 Q. Do you know approximately how much --
 13 A. No.
 14 Q. -- the tolls were?
 15 A. No.
 16 MR. ANDREWS: Let the question
 17 be asked first.
 18 Q. Looking at Defendant's 53, do you
 19 recognize that document (handing)?
 20 A. It's the same one as 52.
 21 Q. The top of 52?
 22 A. Yes.
 23 Q. Looking at Defendant's 54, do you
 24 recognize that document (handing)?
 25 A. Yes.

[Page 103]

1 T. Jackson
 2 Q. What is that document?
 3 A. This is my 1099.
 4 Q. For what year?
 5 A. 2011.
 6 Q. Does that reflect the compensation --
 7 A. No. This also has the tolls in it.
 8 Q. The \$28,890 has tolls included?
 9 A. Yes.
 10 Q. How do you know that?
 11 A. Whenever we had to give them receipts
 12 for the tolls, it was never a separate check.
 13 They always put it in the one check that we
 14 received weekly. Whatever we were reimbursed
 15 for never came in two checks. It was one
 16 check. It was never a separate check that says
 17 this is for your tolls and this is what we made
 18 for the week.
 19 Q. How did you pay the tolls?
 20 A. I paid the tolls out of my pocket.
 21 Q. Did you have an E-ZPass?
 22 A. Not all the time.
 23 Q. Whatever you spent out of your pocket
 24 for the tolls, you were paid back for?
 25 A. Yes.

[Page 104]

1 T. Jackson
 2 MR. ANDREWS: Objection.
 3 Q. Did you file tax returns in 2007?
 4 A. Yes.
 5 Q. 2008?
 6 A. Yes.
 7 Q. 2009?
 8 A. Yes.
 9 Q. 2010?
 10 A. Yes.
 11 Q. 2011?
 12 A. Yes.
 13 Q. Do you have copies of those tax returns?
 14 A. I think I might have gave my lawyer
 15 those. I gave him what I had.
 16 Q. To the extent you haven't given them to
 17 your lawyer and you still have them in your
 18 possession, I'm making a request for any tax
 19 returns filed between 2007 and 2011.
 20 A. If I have them?
 21 Q. Yes.
 22 A. You want to see them?
 23 Q. Yes.
 24 MR. ANDREWS: That's for Yale
 25 and I to work out. We'll talk about

[Page 105]

1 T. Jackson
 2 that later.
 3 THE WITNESS: Okay.
 4 Q. Do you know if you claimed any
 5 compensation you received from Late Night on
 6 those tax returns?
 7 MR. ANDREWS: Objection.
 8 A. Did I claim any compensation? You have
 9 to explain that more. I don't understand what
 10 you're trying to say.
 11 Q. You filed tax returns you said --
 12 A. Right.
 13 Q. -- for each year that you performed
 14 deliveries as a driver --
 15 A. Right.
 16 Q. -- for Late Night, correct?
 17 A. Right.
 18 MR. ANDREWS: Objection.
 19 Q. Who prepared the tax returns?
 20 A. The tax person that I went to that year.
 21 Q. Was it the same person each year?
 22 A. Not always, no.
 23 Q. Was it an individual or a firm in 2007?
 24 A. I don't know. Might have been a firm.
 25 Q. Like an H&R Block?

[27] (Pages 102 to 105)

[Page 106]

1 T. Jackson
 2 MR. ANDREWS: Objection.
 3 A. I don't know who it was, but it might
 4 have been a firm.
 5 Q. Do you know if you ever gave the 1099
 6 forms to the person who prepared your tax
 7 returns?
 8 A. I gave them a copy of what I got from
 9 Fresh Diet.
 10 Q. Do you know if any expenses were
 11 deducted on the tax returns?
 12 A. If any expenses were deducted? Yes, I
 13 think so.
 14 Q. Do you know what expenses?
 15 A. I think it was my mileage.
 16 Q. Anything else?
 17 A. My daughter.
 18 Q. I'm just talking relating to expenses
 19 incurred as a driver.
 20 A. I don't know what else. I don't
 21 remember. Mainly, it was my mileage.
 22 Q. Do you remember if you filed them
 23 quarterly or at the end of the year?
 24 A. I filed at the end of the year.
 25 Q. Did you ever receive any type of

[Page 107]

1 T. Jackson
 2 benefits from The Fresh Diet?
 3 A. No. I -- no.
 4 Q. Do you know the name Judah Schloss?
 5 A. Judah?
 6 Q. Or Judah.
 7 A. Judah, yeah.
 8 Q. Who do you know him to be?
 9 A. Judah's the boss.
 10 Q. The boss of what?
 11 A. Fresh Diet.
 12 Q. Have you ever personally interacted with
 13 him?
 14 A. Not really, just to say hi maybe.
 15 Q. Do you know the name Zaimi Duchman?
 16 A. Yes.
 17 Q. Who do you know Zaimi Duchman to be?
 18 A. One of the bosses from Fresh Diet.
 19 Q. Have you ever personally interacted with
 20 Mr. Duchman?
 21 A. Just to say hi.
 22 Q. Did you maintain a cell phone at the
 23 time you were performing deliveries as a driver
 24 for The Fresh Diet?
 25 A. Yes.

[Page 108]

1 T. Jackson
 2 Q. Yes?
 3 A. Yes.
 4 Q. Did you ever communicate by text message
 5 with Syed on that cell phone?
 6 A. Yes.
 7 Q. What would you text Syed about?
 8 MR. ANDREWS: Objection.
 9 A. Different things.
 10 Q. Would you ever text if you completed
 11 your delivery?
 12 A. Sometimes.
 13 Q. Do you still have the cell phone that
 14 you used to text with Syed?
 15 A. At that time? No, it was a different
 16 cell phone.
 17 Q. You don't have it anymore?
 18 A. No, I don't have that cell phone.
 19 Q. When did you last have that cell phone?
 20 A. I don't know.
 21 Q. Do you know if it was before July 2012?
 22 A. I don't know.
 23 Q. Were you ever advised by your attorneys
 24 to preserve all relevant information in your
 25 possession concerning your claims in this

[Page 109]

1 T. Jackson
 2 action?
 3 A. To preserve? Can you explain that
 4 further?
 5 Q. Did you ever receive any instruction
 6 from your attorney to preserve or not destroy
 7 information --
 8 A. To save whatever --
 9 MR. ANDREWS: I object to the
 10 form of that question to the extent it
 11 calls for disclosure of attorney client
 12 privileged information. Perhaps, if the
 13 question's asked differently, it
 14 wouldn't request disclosure of that
 15 communication.
 16 Q. Have you preserved all information
 17 relevant to the claims in this action?
 18 A. Have I saved --
 19 Q. Saved, yes.
 20 A. -- anything?
 21 Q. Saved everything.
 22 A. I don't recall saving anything, no.
 23 MR. POLLACK: Pending the
 24 production of the additional documents
 25 requested at the deposition, I have no

[28] (Pages 106 to 109)

[Page 110]

1 T. Jackson
 2 further questions.
 3 MR. ANDREWS: I have just a
 4 couple minutes of follow-up questions.
 5 EXAMINATION BY
 6 MR. ANDREWS:
 7 Q. Ms. Jackson, do you recall, in addition
 8 to everything else you've testified to today,
 9 there being occasional driver meetings?
 10 A. Yes.
 11 Q. Who was in charge of those driver
 12 meetings?
 13 A. Syed.
 14 Q. How frequently were those driver
 15 meetings held?
 16 A. When we got to Brooklyn, quite
 17 frequently.
 18 Q. Where were the driver meetings held?
 19 A. Siegel Street.
 20 Q. Can you describe where in Siegel Street
 21 they were held?
 22 A. Upstairs in his office.
 23 Q. In Syed's office?
 24 A. Yes.
 25 Q. Were all the drivers present at these

[Page 111]

1 T. Jackson
 2 meetings?
 3 A. Pretty much, yes.
 4 Q. Do you recall what was typically
 5 discussed at these meetings?
 6 A. Different things.
 7 Q. Do you recall when these meetings were
 8 held during the day?
 9 A. Usually, before we start our route,
 10 before we went out.
 11 Q. Earlier, Mr. Pollack asked you if you
 12 recognized a certain handwriting on the
 13 manifest, and you testified that you recognized
 14 your husband's handwriting --
 15 A. Yes.
 16 Q. -- on some of the pages.
 17 Do you recall that?
 18 A. Yes.
 19 Q. You also testified that, at times, your
 20 husband road along with you when you --
 21 A. Yes.
 22 Q. -- delivered food.
 23 Do you recall that testimony?
 24 A. Yes.
 25 Q. Did your husband actually do your work

[Page 112]

1 T. Jackson
 2 for you when he was with you?
 3 A. No. He mainly went along as company, to
 4 keep me company.
 5 MR. ANDREWS: I have no further
 6 questions.
 7 CONTINUED EXAMINATION BY
 8 MR. POLLACK:
 9 Q. You testified that that was your
 10 husband's handwriting on the manifest, correct?
 11 A. Yes.
 12 Q. Did he also actually, physically, ever
 13 bring a bag to a customer's door?
 14 A. Sometimes, yes.
 15 MR. POLLACK: Thank you. I have
 16 no further questions.
 17 (Time Noted: 4:42 p.m.)
 18
 19 _____
 20 TERESA JACKSON
 21
 22 Subscribed and sworn to before me
 23 this ____ day of _____, 2013.
 24 _____
 25 Notary Public

[Page 113]

1 INDEX
 2
 3 WITNESS EXAMINATION BY PAGE
 4 Teresa Jackson Yale Pollack 4, 112
 5 Peter J. Andrews 110
 6
 7 E X H I B I T S
 8
 9 DEFENDANT'S DESCRIPTION PAGE
 10 48 Notice of EBT 18
 11 49 Late Night Express Independent 48
 12 Contractor Agreement
 13 50 Class action affidavit 50
 14 51 Manifests 67
 15 52 2010 1099 form 101
 16 53 2010 1099 form 101
 17 54 2011 1099 form 101
 18
 19 REQUESTS FOR PRODUCTION
 20
 21 DESCRIPTION PAGE
 22 Independent contractor agreement with PCF 9
 23 Tax returns filed between 2007 and 2011 104
 24
 25

[29] (Pages 110 to 113)

[Page 114]

1 CERTIFICATE

2
3 I, MELISSA KAHANE, hereby certify that
4 the Examination Before Trial of TERESA JACKSON
5 was held before me on the 2nd day of October,
6 2013; that said witness was duly sworn before
7 the commencement of her testimony; that the
8 testimony was taken stenographically by myself
9 and then transcribed by myself; that the party
10 was represented by counsel as appears herein;

11 That the within transcript is a true
12 record of the Examination Before Trial of said
13 witness;

14 That I am not connected by blood or
15 marriage with any of the parties; that I am not
16 interested directly or indirectly in the
17 outcome of this matter; that I am not in the
18 employ of any of the counsel.

19 IN WITNESS WHEREOF, I have hereunto set
20 my hand this 2nd day of October, 2013.

21
22 _____
23 MELISSA KAHANE
24
25

[Page 115]

1 ERRATA SHEET
2 PAGE/LINE CORRECTION

3	_____	_____
4	_____	_____
5	_____	_____
6	_____	_____
7	_____	_____
8	_____	_____
9	_____	_____
10	_____	_____
11	_____	_____
12	_____	_____
13	_____	_____
14	_____	_____
15	_____	_____
16	_____	_____
17	_____	_____
18	_____	_____
19	_____	_____
20	_____	_____
21	_____	_____
22	_____	_____
23	_____	_____
24	_____	_____
25	_____	_____

[30] (Pages 114 to 115)

A				
abbreviate	14:2,22 18:8	appear 48:23	45:13 46:6,7	blood 5:24,25
21:16	20:18 21:14,23	49:12,15 67:25	46:19,22 47:4	114:14
ability 6:9,12,19	22:11 23:12	appeared 22:3	47:11,12,14,18	Bloomfield 73:3
able 95:3,5	26:20 28:23	appears 68:8	55:22 56:11,12	Bloom's 14:6,7,8
absence 23:13	30:2,6,18,21	114:10	56:16,17,23	14:14,24,25,25
23:16	31:4 32:18,25	approximate	58:12 73:20	boss 107:9,10
Acklin 1:4 17:7	33:6 34:23	44:18	79:18 84:24	bosses 107:18
Acklin's 17:9	35:9 36:10	approximately	88:12,13 93:19	boy 16:14 26:12
action 4:23	37:21 46:3	102:12	95:21 103:24	29:6
18:18,20 19:23	48:2 49:2 50:3	April 96:2	background	Boyland 52:15
50:23 109:2,17	50:10,14,20	arrive 40:24	15:3	52:17,18
113:13	52:16,18 57:18	42:2 60:3	bad 37:16 98:16	break 46:2
actual 61:14,15	59:8 60:4,19	arrived 57:10,16	bag 31:8,8 38:23	92:11 95:15
89:10,11	61:13 62:15	Ashley 16:17	43:16 59:13,13	99:10 100:5
addition 110:7	65:3,8 67:23	asked 23:13	59:22,22 64:14	breakfast 13:22
additional	68:4,12,22	24:15 97:25	112:13	breaks 99:6,8
109:24	69:6,15,21	102:17 109:13	bagged 33:16	breast 23:9 66:5
address 4:10	73:11,16 76:24	111:11	59:17	briefly 15:2
20:11 27:20	77:5,21,25	asking 4:21	bags 24:10 30:14	bring 46:22 47:4
38:9 42:17,23	79:3,11,21	48:18 49:2	31:11 37:3	47:10,12,18,22
52:14 53:16	80:3 81:2,14	attention 54:11	46:22 47:4,8	112:13
addresses 20:12	82:14,24 83:5	attorney 2:5	47:18 55:8,24	Brooklyn 42:14
91:13	83:9 84:16,21	88:21 89:2,3	56:11,23 58:13	42:18 44:3,5
administer 3:15	85:8,11 87:7	109:6,11	59:19 62:11	45:11 52:13,25
advised 108:23	87:16 88:5,17	attorneys 2:11	64:13	53:13,14 54:21
affidavit 7:6	90:4,10 92:8	3:4 19:23	Baltic 42:25	55:22 73:4,18
50:24 51:14,17	92:10,24 93:15	108:23	45:17 63:15	73:19 74:6
51:19 113:13	94:19,23 95:6	August 23:4	band 68:5	75:7 93:11,18
afternoon 4:14	96:22 97:3,7	authorized 3:15	Barron 10:16	93:19 110:16
9:18	97:15,24 98:13	avenue 52:21	basis 63:21	brought 56:11
AGREED 3:3,8	99:3 100:7	a.m 9:20,21,25	Bate 67:17	56:12,23
3:13	102:2,16 104:2	10:2 28:6	bathroom 99:12	Brunswick 96:9
agreement 9:3,4	104:24 105:7	34:10,15,16,22	100:9	Bryant 1:4 64:7
9:9 47:25 48:7	105:18 106:2	41:4,4,7 72:16	beginning 13:4	bulk 11:20,22
113:12,22	108:8 109:9	72:17 73:25	30:19 34:2,3	bunch 84:22
ahead 71:10	110:3,6 112:5	75:15 77:6	38:22 43:21	burnt 65:24,25
81:16	113:5	78:11,14,22,23	90:16,22,23	B-L 14:10
ALC 1:8	answer 5:9,14	79:16,22 80:19	100:20	B-L-O-O-M-S
alcohol 6:16	5:16 6:8 8:19	92:9 96:14,15	Behalf 1:5	14:9
Allentown 45:7	8:20,23 33:2	a/k/a 1:11	believe 29:7	
amount 11:22	41:13 57:19		60:22 88:15	C
Andrews 2:8 5:7	82:21 98:2	B	benefits 107:2	C 2:2 4:2 114:1
5:20 6:6 8:13	answering 5:12	B 42:24 113:7	bigger 28:14	114:1
8:18,20,24 9:5	anybody 23:21	back 18:5 24:19	39:25 40:2	call 32:12 33:4
9:24 10:2,20	anymore 108:17	24:24 25:2,12	birth 16:24,25	65:24 98:11
10:22 13:11,14	apartment 4:12	25:14,18 26:2	blank 73:22	99:22,25 100:4
	52:23 53:20,22	36:23 39:11	Block 105:25	calling 47:7

calls 109:11	claim 105:8	55:20	correct 30:17	101:9,12,15
Canaan 78:18	claimed 105:4	computer 89:9	51:20 59:5	dates 14:4 22:21
78:19,20,24	claims 4:22	concerning	73:22 81:13	daughter 17:5
79:4,5,6	18:19,22 19:23	108:25	85:3,10 86:6	84:2 106:17
cancer 23:9 66:6	67:20 108:25	connected	89:6,24 90:19	David 1:4 39:20
caption 18:12	109:17	114:14	90:24 92:16,25	64:4
car 31:11 37:4	Class 50:23	Connecticut	93:16 94:17	day 9:13 10:24
41:25 66:7,10	113:13	4:13 10:4,14	95:4,12 105:16	20:24 30:8,10
Cardiology 29:6	client 109:11	12:19 14:13	112:10	31:2 32:21,24
care 66:2,4	close 47:22	25:8,12,19	CORRECTION	33:3 40:17,17
cars 66:18,20	closest 93:6,9	27:3,4 28:2	115:2	43:17 47:23
67:3,4,6	coffee 99:9,14	30:23 36:4,6	counsel 114:10	59:15,20 62:17
catering 1:11,12	collect 31:10	38:7,8 39:2,6	114:18	64:15 65:11,12
25:25 26:3	come 24:15,19	39:23 40:6,8	count 56:16	66:6 71:7,8
38:14	24:24 25:2	40:12,21 41:22	couple 7:22	81:8 87:6
Cecilia 1:4 17:12	35:10 47:7,9	41:23 42:2,6	12:25 27:14	97:23 98:18,18
cell 107:22 108:5	47:11,14 59:11	42:13,14 43:12	110:4	98:23 111:8
108:13,16,18	59:12 61:4	44:14 45:14,18	Courier 1:10	112:23 114:5
108:19	coming 47:11	45:20 46:7,9	21:8,11,17,21	114:20
certain 10:17	commencement	46:14 52:7,12	court 1:2 3:17	days 9:11,11
33:17,18 92:16	114:7	54:7 73:4,14	5:12,15	33:17,18 34:15
111:12	commercial 11:6	74:3,5 75:4,7	crossed 86:18	34:16
certification 3:5	11:10,11,13,17	78:16,25 79:23	currently 7:14	daytime 29:18
certify 114:3	communicate	80:20 95:2	15:15 17:2	decide 95:3
change 34:14	108:4	considered 8:16	customer 70:25	decided 93:13
35:8 37:24	communication	consisted 54:19	77:4	decision 95:5
38:3,18,20	109:15	contain 69:3	customers 20:10	96:21
39:24 40:7,15	company 21:7	70:20	30:15 54:24	deducted 106:11
43:13,19 45:12	112:3,4	contained 78:6	55:8 76:22	106:12
90:23	compared 34:15	91:2 94:7	customer's	Defendant 1:19
changed 92:21	compensated	contains 91:20	112:13	defendants 1:14
changes 55:7	63:23 64:11	CONTINUED	CV 1:8	2:11 54:19
63:11 98:18	compensation	112:7	C-O-N-V-E-R-T	63:19
charge 110:11	8:8 58:21	contract 48:17	53:17	Defendant's
check 8:5 21:9	101:24 103:6	contractor 8:17		17:21 18:3,5
21:24 100:25	105:5,8	9:4,8 48:7	D	19:5,11,17
101:4 103:12	complaint 67:21	50:18 113:12	D 113:1	48:8,12 50:24
103:13,16,16	complete 55:23	113:22	daily 10:15	51:4 54:12
checks 22:4,5,6	56:4,6,7 58:12	Convert 53:17	63:20	63:18 67:11,16
22:7 103:15	64:23 71:16	cooler 56:23	Darien 78:15,25	74:9 101:8,11
child 16:18	76:13,17 77:23	copies 104:13	79:23 80:20	101:14,17
children 16:10	78:5 87:5,14	copy 9:8 51:14	date 7:23 13:9	102:18,23
16:12	91:23	51:17,22,24	16:24,25 18:4	113:9
Chow 1:3 39:18	completed 73:21	89:8 101:19	42:10 46:24	definitely 74:11
cities 45:3	91:18 99:2	106:8	48:9 49:20	definitively
city 10:5 26:6	108:10	corner 81:20	51:2 58:14	75:18
93:18	completing	CORP 1:10,12	67:12 86:24	deliver 7:19

10:13,23 11:11	63:2 95:10	109:13	110:11,14,18	eighty 59:10
12:2,5 20:11	depends 13:22	dinner 13:23	drivers 39:12,15	either 45:23
30:14 59:23	34:17 37:15,16	directly 114:16	60:23 61:3,5,8	eleven 14:19
63:12 93:14	41:24 57:25	disciplined	64:2 110:25	76:5,20,21
94:6	62:16 63:10,12	47:20 97:2,13	drivers/food	77:2
delivered 8:11	65:20 98:14,18	disclosure	63:20	Eli's 12:11,18,24
10:17 13:22,23	98:21	109:11,14	driver/food	13:6,8,17,21
13:23 33:9	deposed 17:14	discussed 111:5	54:18	13:25 14:17,21
45:4 92:22	deposition 3:14	DISTRICT 1:2	driving 36:17	Elmsford 27:17
111:22	4:16 6:23 7:10	1:2	40:20	27:18,19
deliveries 11:17	21:12,19 51:16	doctor's 29:8	dropped 96:5	emergency 66:2
12:17 28:20	51:20 70:18	document 17:19	drop-off 70:25	66:4
29:2,15 31:3	109:25	17:23 18:7,13	77:3 78:10	employ 114:18
31:12,13 33:14	derived 8:8	19:4,8,14,19	drop-offs 45:7	employed 7:14
33:22 34:21	describe 15:2	48:10,15,19,24	drove 64:18,21	7:16 12:8
40:5 50:19	110:20	49:10,16,18,22	drugs 6:15	employee 54:19
53:11 55:21	DESCRIPTION	50:2,8,13 51:6	Duchman 1:13	employees 63:20
61:12,14,15	113:9,21	51:9,22 52:2	107:15,17,20	63:22 64:11
62:14,21 63:8	destroy 109:6	67:15 69:2	duly 4:3 114:6	employment
65:16,19,22	diagnosed 23:9	71:25 77:8	duties 30:11	13:5 58:19
66:8 83:22	Dickerman 4:12	87:4 95:18	38:18 43:13	63:18
92:15 99:7	Diet 1:9,10,10,11	98:2 102:19,24	50:5	empties 47:10,12
100:6,12 102:9	1:12 22:7,10	103:2	d/b/a 1:11	empty 37:3
105:14 107:23	22:15,18 23:6	documents 6:22	<hr/> E <hr/>	55:23 58:13
delivering 7:20	25:21 28:12,21	19:22 67:19,22	E 2:2,2 4:2,2	ended 13:8 23:3
10:12 11:23	29:3,12,13,15	68:2 80:5	113:1,7 114:1	44:5,11 45:6
33:23 45:9	29:20,24 30:14	109:24	114:1	entail 24:8
54:23	37:7,19,23	doing 26:21,25	earlier 21:2 41:6	entailed 30:11
delivery 10:19	38:11 39:13	27:10 28:16	47:9 51:15,18	enter 47:24
14:3 22:19	42:5 45:16	29:10 36:3	70:16 111:11	entire 83:8,12
27:12 29:19	46:13 50:6,18	45:6,18,20	earliest 32:5,7	entry 84:25 85:5
46:13 53:25	50:21 53:8	dollar 31:22	34:8 35:20	ERRATA 115:1
54:18,22 55:5	54:9 59:25	Dolowich 1:20	61:11,17 62:20	ESQ 2:8,13
63:20 71:20	73:7 100:18,20	2:11	62:22,25,25	everybody 60:25
72:18,20,23,24	106:9 107:2,11	door 11:23	early 47:7,23	64:8,17
73:20 74:23	107:18,24	112:13	easier 26:23	everybody's
76:7,10 78:13	Diet's 54:20,24	doors 82:18	eat 99:9,15,18,19	39:22
80:17 85:3,6,9	55:22	double-sided	99:23 100:8	exact 7:23 42:23
87:5 92:2,7	different 11:16	68:18	EBT 18:2	Examination
96:5,6,12	20:6 24:13	drive 12:22 44:6	113:10	1:17 4:6 110:5
108:11	32:4 35:13	driver 20:15	educational 15:3	112:7 113:3
Delroy 15:18	59:17 60:25	22:19 24:16	effect 3:16	114:4,12
16:20 82:8	64:19,20 66:18	25:15,21 26:15	eight 16:9 77:2	examined 4:5
depending 34:24	66:20 89:23	53:8,12,25	91:5	example 6:7
35:14 36:19	90:5 91:6,14	54:8 100:17	eighteen 71:11	11:24
40:18,22 44:7	108:9,15 111:6	105:14 106:19	71:12	excess 58:20
57:13 59:20	differently	107:23 110:9		exclusively

31:14 54:20	FD000780 49:10	102:4	food 31:5 32:17	10:24 11:12
Excuse 20:21	FD000781 49:13	file 2:14 104:3	32:19 38:23	28:3
Exhibit 17:21	FD000782 49:16	filed 104:19	43:16 59:14,14	Fridays 11:2
18:3 19:6,11	FD003415 67:17	105:11 106:22	59:16,21	friend 26:10
19:17 48:8,12	FD003468 68:25	106:24 113:23	111:22	29:24 30:5
50:25 51:4	69:10	filing 3:5	foot 66:3	31:3 39:16
67:11,16 101:8	FD003470 69:22	fill 24:11 56:18	force 3:16	front 25:23
101:11,14,17	FD003479 70:2	82:13	Ford 66:24	full 88:4
expenses 100:11	70:3	filled 82:15	forgot 11:9	further 3:8,13
106:10,12,14	FD003481 70:8	finish 5:11 6:7	66:22,23	109:4 110:2
106:18	70:13 71:25	33:2 35:12	forgotten 72:12	112:5,16
experiences	FD003483 74:13	57:19 65:8	form 3:9 101:7	furthest 93:5,9
63:21 64:10	FD003484 74:15	73:12	101:10,13	93:18,21,22
explain 30:25	75:9	finished 31:10	109:10 113:15	
89:14 105:9	FD003487 75:23	34:5 36:21	113:16,17	G
109:3	76:2,23	37:7,19 41:3	forms 106:6	gap 13:5
Express 1:9,10	FD003488 75:24	41:24 46:13	forth 67:19	gas 99:13,15
1:12 21:8,9,11	77:8 78:6	56:8,13 57:11	forty 12:2,3	100:2,9
21:17,20,22	FD003489 77:11	finishes 5:8	36:19 40:14,22	Gene 23:24 24:6
22:3,9 47:25	79:13	firm 2:4 105:23	58:20 59:2	gestures 5:17
48:3,6 113:11	FD003490 78:3	105:24 106:4	found 29:11	getting 40:14
extent 104:16	FD003491 80:6	first 4:3 30:8,10	66:5	73:20 79:18
109:10	81:4	38:3 39:11	four 76:25 91:4	84:24
E-L-I 12:13	FD003492 80:6	42:19 53:23	fourteen 90:24	girl 16:14,15
e-mail 55:18	FD003493 81:18	71:20,25 72:2	91:2	give 11:24 13:9
E-ZPass 103:21	81:21	72:18,20,23,24	fourth 48:23,25	25:18 42:10
	FD003500 84:16	74:20,23 76:7	49:6	55:10,11,17
F	FD003501 84:18	78:9 80:8 85:2	frequently 20:19	88:21 103:11
F 114:1	FD003757 87:18	92:2 96:5,6	20:22 110:14	given 10:24
facilities 54:21	FD003775 88:7	102:17	110:17	37:13 87:6,15
55:22	FD003776 88:7	five 15:21 76:25	Fresh 1:9,10,10	104:16
facility 24:9 32:3	91:7	91:4	1:11,12 22:7,9	Glastonbury
32:23 35:4	FD003777 90:15	FL 1:10,11,11,12	22:14,17 23:5	93:23
36:18,22,23	91:8	1:12	25:21 28:12,21	go 1:11 24:9,13
37:24 40:12,21	FD003782 91:22	flip 87:3	29:3,12,13,15	24:14 25:14
42:3,13 43:3	FD003783 91:22	floor 53:23	29:19,24 30:14	31:5,11 36:23
44:3 46:8,19	FD003854 95:19	flower 14:3,8	37:6,19,23	36:25 65:25
58:11 60:3,10	FD004192 67:18	focused 41:21	38:11 39:13	66:4 71:10
73:4 74:6 75:7	February 13:8	62:23	42:5 45:16	81:16 82:10,11
83:15 93:11	Fernando 1:3	focusing 31:23	46:13 50:6,18	82:20,23 83:15
Fair 87:2	7:12 64:7	35:3	50:21 53:8	83:24 84:2
familiar 42:25	Fields 15:25	follow 92:19	54:9,20,24	87:13 91:17
43:2	16:2,3,4,8,18	followed 43:12	55:21 59:25	98:8 99:12,17
far 12:20 36:17	fifteen 12:21	following 49:13	73:7 100:18,20	goes 12:5
40:20 44:2,6	31:18 44:8	72:5	106:9 107:2,11	going 4:20,21
73:3 74:5 75:6	fifty 40:22	follows 4:5	107:18,24	9:7 17:19,22
father's 16:22	figure 97:22	follow-up 110:4	Friday 9:16	19:7,13,18

25:12 37:17	82:6 84:6,12	14:15	72:6 74:17	J
39:11 46:6	84:17,25 85:13	hours 9:14 13:20	75:10 78:9,12	J 2:8 4:2 113:5
48:10,14 51:5	85:17,19,22	27:24 29:18	80:7,15 85:2,5	Jackson 1:4,4,18
59:20 67:15,21	87:5,14,17,24	35:8,14 40:15	96:4,11,18	4:9,14 5:1 6:1
68:10,15 84:19	88:2,3,8 91:20	40:16 43:19	indicated 76:19	7:1 8:1 9:1
91:16 92:12	91:21 95:18,21	58:20 59:2,7	indicates 70:24	10:1 11:1 12:1
98:12 99:23	111:12,14	63:14 67:19	indicating 49:3	13:1 14:1 15:1
100:2,8,9,9	112:10	73:6 75:8	55:2 68:21	16:1 17:1,12
Gonzo 1:20 2:11	handwritten	husband 15:20	69:25 70:8	18:1 19:1 20:1
good 4:14 22:21	86:10	82:7 83:20	74:12 75:21	21:1 22:1 23:1
GRAB 1:11	happen 47:5	111:20,25	77:13,18 79:9	24:1 25:1 26:1
grade 15:4,6	95:8	husband's 15:17	80:2,25 81:7	27:1 28:1 29:1
graduated 15:4	happened 42:15	82:5 84:6,14	81:11,18 82:3	30:1 31:1 32:1
guess 31:18 73:5	46:23 47:6	91:20 111:14	86:9,19,24	33:1 34:1 35:1
91:16	62:5,6 94:3	112:10	87:20,24 88:4	36:1 37:1 38:1
guy 39:20	97:22	Hussain 1:12	88:12,14,20	39:1 40:1 41:1
GUZMAN 1:5	hard 89:8	97:2	90:7 91:8	42:1 43:1 44:1
	HARMAN 2:4	H&R 105:25	93:24 101:21	45:1 46:1 47:1
H	Haven 4:13	I	102:5	48:1 49:1 50:1
H 113:7	10:14 14:12	ice 31:8 38:23	indirectly	51:1 52:1 53:1
half 26:25 34:4	hear 8:14 26:9	56:12,22 59:18	114:16	54:1 55:1 56:1
58:22 73:6	heard 21:7	59:19	individual	57:1 58:1 59:1
74:8	held 1:19 29:17	identification	105:23	60:1 61:1 62:1
hall 25:25 26:4	110:15,18,21	17:21 18:4	Individually 1:5	63:1 64:1 65:1
Hamden 10:6	111:8 114:5	19:5,11,17	1:12,13,13	66:1 67:1 68:1
12:19,20	Hello 4:15	48:9,11 50:25	influence 6:15	69:1 70:1 71:1
hand 5:17 57:20	help 31:7 39:6	51:4 67:12	information	72:1 73:1 74:1
57:23 58:3	43:15,16,16,17	101:9,12,15,17	55:10 56:9,18	75:1 76:1 77:1
114:20	59:13	identify 80:4	56:21 108:24	78:1 79:1 80:1
hanging 17:24	helped 64:14	88:6	109:7,12,16	81:1 82:1 83:1
19:6,12,20	hereunto 114:19	impact 6:5,12	insert 70:21	84:1 85:1 86:1
48:12 51:6	Hernandez 1:3	impair 6:18	instruction	87:1 88:1 89:1
67:22 69:16	7:12	implemented	109:5	90:1 91:1 92:1
101:18 102:19	hi 107:14,21	58:9 60:14,16	instructions	93:1 94:1 95:1
102:24	high 15:6,7,11	61:10 65:2	5:18 54:21	96:1 97:1 98:1
handle 28:13	15:12	included 102:7	55:4	99:1 100:1
handwrite 57:14	higher 12:6	103:8	insurance 67:6,8	101:1 102:1
handwriting	Hill 75:4,6	income 100:15	interacted 63:19	103:1 104:1
67:25 68:8,9	hiring 39:10	incurred 100:11	107:12,19	105:1 106:1
68:17,20 69:3	hold 29:3	106:19	interested	107:1 108:1
69:4,5,9,12,17	HOLDINGS	independent	114:16	109:1 110:1,7
69:18,24 70:4	1:11	8:17 9:4,8 48:7	introduced	111:1 112:1,20
70:7,10 74:11	home 37:2 58:7	50:18 113:11	26:18	113:4 114:4
74:12,15 75:19	honestly 45:24	113:22	involved 17:16	James 16:23
75:20,24 77:8	hour 14:15 74:7	Index 1:8	Island 25:5	January 52:5
77:10,15 79:25	74:7 92:13	indicate 71:9,19	45:10 96:13	89:18,20 90:17
81:21,22 82:4	hourly 8:6 13:18		it'll 12:3	Jersey 25:5,22

31:24 33:22	28:16,18,24	1:5	58:18 63:17	12:9
35:3,17 36:18	29:24 31:7,16	lawsuit 17:16	75:9,17 76:2	marked 17:20
36:22,23,24	32:10,21 34:4	lawyer 7:11	76:13 78:3	18:3 19:5,10
37:24 38:5,6	35:5 38:8,9	89:11,12	80:7 84:8	19:16 48:8,11
38:16,24,25	39:12 41:23	104:14,17	89:17 93:25	49:10 50:24
39:2,3,4 42:6	42:5,7,9,24	leave 23:13,14	102:18,23	51:3 67:11,16
44:13,16,20,21	44:15 49:18	23:16 55:8	looks 51:24	101:8,11,14,16
45:4 96:9	52:14,20,21	left 31:8	68:20 69:4,8,8	Marquis 1:4
Jersey/New	53:23 59:9,15	leg 65:24,25	69:17,19,20,24	4:18
45:22	60:23 61:3,7	Let's 70:12	70:5,5,7,10	marriage 114:15
JLC 1:8	63:12,21 64:9	81:16 84:20	71:11,12 75:20	marriages 15:22
job 26:18,24	64:17,20,22,24	87:23	78:18,18 79:25	married 15:15
27:5 29:4	69:18 73:3,7	Lincoln 15:12	82:15 84:14,17	15:19 16:4,7
JUANY 1:5	73:13 74:5	line 4:20	87:17 88:7	math 16:6
Judah 1:13	75:6 81:9	listed 76:22 77:4	89:25 90:22,23	matter 114:17
107:4,5,6,7	85:25 86:3,14	little 54:6	91:22 92:4,9	maximum 36:15
Judah's 107:9	87:4 88:9 90:2	live 36:17 40:20	93:6,21,22	McNeil 15:18
July 23:4 108:21	90:21 94:3,12	52:12 53:10	94:4	16:20 82:8
June 23:2	94:13,15,20,25	54:4,5,6	lot 68:13	meal 55:20
K	95:10 97:5,6,7	lived 47:22	lunch 13:23	59:22
K 4:2	97:9,10,11,12	living 44:2 53:7	Lyndhurst 26:7	meals 33:8 54:23
KAHANE 114:3	97:17,19 98:7	54:3,7	26:8	82:17 92:22
114:23	98:9,10,17,18	LLP 1:21 2:11	M	mean 8:10 18:25
Kaufman 1:20	98:22 102:12	located 10:3	maintain 107:22	24:3 47:4 55:5
2:11	103:10 105:4	12:18 14:11	making 46:22	56:25 58:25
keep 5:20 8:13	105:24 106:3,5	15:13 25:21	47:3 104:18	74:23 86:14
13:11,15 75:17	106:10,14,20	26:6 27:16	manifest 20:9,10	93:3 98:16
84:19 112:4	107:4,8,15,17	55:16 59:25	55:6 56:5 57:3	meaning 59:2
Ken 39:21	108:20,21,22	73:7	63:11 70:15,22	72:10 79:16
Kenneth 1:3	known 37:19	location 37:23	71:13 74:17	93:4,4
39:17,18 64:4	L	37:25 38:12	76:14 77:19,23	means 21:20
key 55:7	L 3:1	41:22 42:18	78:5 81:10,13	medications
Kimble 23:24	late 1:9 13:24	43:4,13,20,24	82:13 85:2	5:23 6:2,11
24:6	20:15 21:7,9	43:25 44:4,10	90:6 91:23	meetings 110:9
kind 66:22	21:10,11,15,16	45:17 46:7,14	93:17 94:7,22	110:12,15,18
kitchen 25:24	21:17,20,20,22	46:19 60:2	95:10,11 97:2	111:2,5,7
26:2 38:11	22:3,9 47:25	62:24 63:9,15	98:12,20,21	MELISSA 114:3
39:5 43:6,9	48:3,6 64:25	locations 42:12	111:13 112:10	114:23
93:18,20	100:24 101:25	long 7:20 12:24	manifests 20:2,6	Mercury 66:16
know 5:2 7:24	105:5,16	15:19 16:7	20:14,17,20,23	66:16,21
8:16 10:7,23	113:11	25:5 27:13	24:11 31:11	message 108:4
13:20 16:22	latest 32:8,9	28:25 33:21	56:19 57:5	met 30:4,7,10
19:25 21:12	34:12 41:11,12	52:7 53:3	67:10 89:11,16	MICHAEL 1:5
22:8,12 25:23	61:19,21,23,24	64:22	89:23 90:3	middle 43:22,23
26:3,6,14	62:12 63:4	look 48:14 70:12	91:15 113:14	Midnight 62:10
27:20,22,23	LATTIMORE	82:5 88:4 98:2	March 7:25 12:8	mile 31:21,22
		looking 18:5		mileage 13:19

14:15,21 59:4 106:15,21 miles 31:20 34:17,25 35:15 63:2 mine 51:21 67:5 68:16 70:6 101:21 minimum 36:12 36:14 minutes 12:21 36:19 40:22 44:8 110:4 mistake 79:7,14 mistaken 25:4 30:22 60:11 79:4,6 mixed 93:7 mom 23:9 Monday 9:15 10:24 11:12 28:3 Mondays 11:2 month 7:24 22:25 23:3 24:18 28:16 months 7:22 12:25 27:15 28:24 morning 9:19,20 34:13 35:22,24 61:25 62:3,4,8 63:6 mother 66:5 move 42:12 87:23 moved 39:2,6,23 40:12 42:5 43:3,14,19 44:10 moving 44:5 74:9	15:17 16:16,22 18:12 23:24,25 26:3,12,13,13 29:5 39:22 66:17 107:4,15 named 39:21 names 20:10,12 61:7 need 68:12,15 97:25 needed 31:9 40:18 43:15,17 59:14 62:17 64:15 nephew 4:18 17:6,9 39:17 44:13 64:4 never 58:21 59:3 60:21 65:10 90:12 101:3 103:12,15,16 New 1:2,21,22 1:24 2:7,7,12 2:12 4:4,12 10:14,15,15 15:14 25:22 27:4,17 30:23 31:3,14,24 33:22,23 35:3 35:17 36:4,6 36:18,22,23,24 37:24 38:5,6 38:16,24,25 39:2,3,4 40:6 42:6 44:13,16 44:20,20,21,22 45:4,9,10,22 53:15 78:18,19 78:20,24 79:4 79:5,6 96:9 News 10:15 newspaper 7:19 10:8 newspapers 7:21 8:9 night 1:9 13:24 20:15 21:7,9	21:10,11,15,16 21:17,20,20,22 22:3,9 36:6 37:13 44:24 47:12,14,19,25 48:3,6 60:18 63:3,11,12,13 65:16,23 71:17 76:14 77:24 79:2 82:23 87:15 91:19 92:23 98:15,22 100:24 101:25 105:5,16 113:11 nights 83:4,7 nine 77:2 91:5 nineteen 71:5 ninth 86:20 nods 5:17 normally 93:8 94:12 North 14:12,12 96:9 Norwalk 74:3,4 74:5 Notary 1:23 4:4 112:25 notation 86:10 Noted 112:17 Notice 1:19 18:2 113:10 November 86:2 91:24 number 8:10 20:2 36:12 53:22 59:11 67:19 68:23,23 79:12,13 81:3 87:18,19 90:11 numbered 67:17 numbers 80:4 88:6 NY 1:10,10,10	oath 3:15 object 109:9 Objection 8:18 9:5 10:20,22 14:2,22 18:8 20:18 21:14,23 22:11 23:12 26:20 28:23 30:2,6,18,21 31:4 32:18 33:6 34:23 35:9 36:10 37:21 48:2 50:3,10,14,20 59:8 60:4,19 61:13 62:15 65:3 67:23 73:16 76:24 77:5,21,25 79:3,21 81:14 82:14,24 83:5 83:9 85:8,11 87:7,16 88:17 90:4 92:8,24 93:15 94:19,23 95:6 96:22 97:3,15 98:13 99:3 100:7 102:2 104:2 105:7,18 106:2 108:8 objections 3:9 obtaining 54:22 occasion 62:7,13 95:9 occasional 110:9 Ocotber 114:20 October 1:22 49:19,20 114:5 offer 25:3 offered 25:4 office 29:8 110:22,23 officer 3:15 offices 1:20 Oh 14:3 26:12 29:6 33:3 49:4	49:4,4 72:9 77:14 90:9 okay 4:24 5:3,6 5:10,22 9:20 10:2 13:13,16 23:19 31:25 35:18 48:13 49:5,6 50:11 55:2,6 70:14 76:15 77:17 79:7 88:12 90:14 92:14 94:3,4 105:3 once 39:6 62:6 82:23 ones 43:11 58:10 68:16,17 89:13 opposed 32:11 37:12 78:25 opposite 69:23 order 92:16,17 92:19,22 93:2 93:8,13,16 94:6,11,17,22 94:25 95:4,12 96:19,25 97:4 97:5,14,18,20 98:8,8,12,25 originals 88:24 89:2 outcome 114:17 Overhill 90:7 overtime 19:3 51:13 58:21 59:3 Owens 16:17,23
<hr/> N <hr/> N 2:2 3:1 4:2 113:1 name 4:8 14:5	<hr/> newspapers 7:21 8:9 night 1:9 13:24 20:15 21:7,9	<hr/> O <hr/> O 3:1 4:2	<hr/> P <hr/> P 2:2,2 3:1 pack 38:22 43:15 64:14 packed 59:22 packers 38:21 39:3,5,7,9,10 43:10 packing 41:24 page 48:24,25	

49:3,6,13 51:25 54:15,16 69:15,23 72:5 77:4,6,13 79:11,13 80:4 81:2 87:9 88:6 90:11,12 91:3 95:22 113:3,9 113:21 pages 91:19 111:16 PAGE/LINE 115:2 paid 8:4 10:7 11:20 13:17 14:14 19:3 31:19 51:13 58:21 59:3,4 67:8 103:20,24 paper 10:10,10 10:12 11:17,22 27:12 55:17 68:13 papers 8:9,10,11 10:13,17,23 11:9 paperwork 55:23 56:3 57:20,24 58:12 paragraph 50:7 50:9,13 54:11 54:13 55:20 58:18 63:17 64:3 part 50:16 77:17 81:15 86:23 90:2,16 particular 63:13 70:25 98:23 parties 3:4 114:15 party 114:9 pause 6:8 pay 11:25 12:5,6 40:7 58:22 103:19 payment 31:21	payments 100:16,24 PC 2:4 PCF 7:17,18,21 8:4,17 9:4,11 10:3 13:6 27:9 27:10,13,16,25 28:2,9,15,20 29:10,13,16 100:19 113:22 Pending 109:23 people 39:4,21 64:5,20 perform 22:17 33:21 36:5 65:15,19,22 performed 22:14,14 66:8 72:11 82:9 99:7 100:17 102:10 105:13 performing 20:15 25:20 27:24 28:8,20 29:2,14,19 31:3 38:4 40:4 50:19 53:7,11 53:25 54:8 61:11 62:13 63:8 83:22 100:5,12 107:23 period 28:19 person 26:14 105:20,21 106:6 personally 54:23 107:12,19 Persons 1:6 pertaining 19:2 51:12 55:9 Peter 2:8 113:5 Philly 45:7 phone 32:12 107:22 108:5 108:13,16,18 108:19	physically 112:12 pick 24:10 31:5 55:6 62:11 pickups 55:7 piece 55:17 pieces 56:12,22 pills 5:24,25 pitched 64:14 pizzeria 12:15 place 29:6 38:14 places 53:6,10 plaintiff 1:18 18:16 Plaintiffs 1:7 2:5 please 4:8,11 5:2 5:11,14 plus 14:15 pocket 103:20 103:23 Pollack 2:13 4:7 9:7,25 45:25 84:23 95:14 97:24 98:4 109:23 111:11 112:8,15 113:4 polls 103:20 portion 30:23,24 position 26:9 29:4,17 30:10 possession 104:18 108:25 possible 34:24 34:24 Post 10:14,15 pounds 11:21 preparation 6:23 7:9 51:16 51:19 prepared 54:22 105:19 106:6 present 110:25 preserve 108:24 109:3,6 preserved 109:16 pressure 5:24,25	pretty 11:3 40:16 44:11 60:20 63:16 64:12 85:12 111:3 previously 17:20 Princeton 45:6,7 prior 7:2,3 15:22 privileged 109:12 Probably 99:5 problem 5:6 65:20 98:15 problems 37:15 produced 19:25 production 109:24 113:19 promised 25:7 provide 19:22 56:10 provision 50:12 Public 1:23 4:4 112:25 purposes 21:18 pursuant 1:19 put 25:12 31:8 31:11 38:23 43:16 59:13 64:14 72:12 79:14 80:24 92:15,25 95:4 103:13 puts 98:20 putting 41:25 p.m 1:23 9:17,21 9:24 33:18,19 34:21 35:3 40:25,25 41:9 41:14,16,18,20 42:3 61:4 62:18,18 72:3 72:19,25 75:2 76:9 78:11,11 80:13 92:5,6 96:7,8 112:17	quarterly 106:23 question 3:10 4:25 5:5,8,9,12 5:15 8:23 33:2 50:11 97:25 102:16 109:10 questioning 4:21 questions 4:22 6:10,13,19 110:2,4 112:6 112:16 question's 109:13 quick 46:2 70:12 quit 36:4 quite 110:16 <hr/> R <hr/> R 2:2 4:2 114:1 range 10:21 rate 11:16 12:5,6 13:18 14:16 58:22 reach 57:2 read 49:22,24 50:15 68:22,23 79:11 80:3 81:2 90:10 98:5 reading 69:22 ready 31:6 32:19 33:9,13,15,16 59:16,22 64:13 really 22:12 26:8 41:23 56:16 59:9 63:10 64:24 69:19 82:21 94:25 107:14 reason 78:24 80:24 99:11 recall 39:15 96:23 97:16 100:22 109:22 110:7 111:4,7 111:17,23
--	---	--	---	---

Q

receipts 103:11	60:8,9 63:7	109:25	111:20	Saturdays 9:16
receive 8:6 11:16	reimbursed	REQUESTS	Robbin 54:5	9:21 11:4
20:14,16,19,22	102:4 103:14	113:19	Rocky 75:4,6	Saturday/Sun...
21:5 71:14	reimbursement	required 55:23	room 66:2,4	11:15
106:25 109:5	14:20 100:10	56:3 58:12	route 23:15,20	save 109:8
received 20:16	100:13	requirements	24:12,25 25:3	saved 109:18,19
21:6 55:4 76:3	relating 106:18	50:6 58:8	26:21,23,25	109:21
77:20,24	relationship	reserved 3:10	27:2 29:23	saving 109:22
100:17 101:20	17:11 22:8	reside 17:2,4	30:5,17,20	saying 81:5
101:25 102:8	23:5	53:3	31:2 33:24	86:11
103:14 105:5	relevant 108:24	residence 12:20	34:4 35:7,17	says 54:17 55:4
receiving 54:21	109:17	residences 53:24	35:25 36:2,9	55:20 58:18
recess 21:25	remainder 21:12	resident 52:8	36:21 37:7,20	63:18 71:3
46:4 67:13	remember 13:10	residential 11:6	39:24 44:9,13	72:14 74:21
95:16	14:4,5,16,20	11:10 30:15	44:14,16,21	76:20,20 86:4
recognize 74:10	14:25 16:5	resign 23:10	45:12,18,21,22	86:6,8 89:18
75:18 77:10	20:5 22:25	respective 3:4	46:8,20 55:9	90:24 91:5
84:5,10,12	23:3 26:8,13	respond 6:9,13	56:8,14 64:23	103:16
85:13,19,22	26:13,17 29:21	6:19	71:5,16 75:11	schedule 20:3,25
102:19,24	29:22 32:25	responsibilities	76:2 79:19	21:3,5,6 43:22
recognized 77:7	37:22 38:9	50:5 54:18	80:9 83:10,12	60:8,9,13,16
84:24 111:12	39:22 42:11,15	rest 81:9	86:2 87:6,14	61:10 65:2
111:13	42:17,23 44:17	restaurant 99:17	88:4,10,16	scheduled 61:4,6
record 4:8,10	45:3,5,8,19,19	return 24:16	90:16 91:18,24	schedules 20:6
8:21,25 57:4	45:23 46:23	55:21,23 58:11	92:3 95:24	Schloss 1:13
69:7,22 98:5	53:16,22 57:18	58:12	96:2 99:2	107:4
114:12	60:13,15 62:5	returns 104:3,13	111:9	school 15:6,7,11
red 66:23	64:8 83:25	104:19 105:6	routes 25:9	15:12
refer 21:10,17	86:15 87:21	105:11,19	28:13,14 44:12	Scott 15:25 16:4
referred 21:2	96:23 99:4	106:7,11	54:22 55:5	16:7,18
51:15	106:21,22	113:23	64:17,19	sealing 3:5
referring 21:13	repeat 50:11	review 6:22,25	row 71:25 74:20	second 26:24
22:6 64:2	87:8 98:3,4	7:2,5	75:9 86:20	42:20 54:15,16
69:10 70:2,16	rephrase 5:4	reviewed 51:15	96:16	55:19 70:12
70:21 71:24	report 37:6,10	51:18,23	rubber 68:5	72:21 92:12
74:13 75:22	37:12,13,14	right 4:18 6:16	run 59:18	96:16
86:20 87:25	46:7,12,19	9:17 16:6 20:5	rush 68:14	see 18:12 54:17
90:13	55:22 58:11	29:16 31:24		54:25 55:25
reflect 101:24	reporter 5:13,16	35:4,19 41:22	S	58:23 63:24
103:6	98:6	55:2 71:8	S 2:2 3:1,1 4:2,2	68:18 71:3
refuse 25:9,10	represent 95:24	76:12 87:10	113:7	74:20 83:17
25:13	represented	89:19 90:18,20	Sable 66:11,14	86:4,12,16
refused 24:24	67:18 114:10	93:10,12 98:9	66:16,16,21	87:5,14 89:17
regarding 4:22	represents 85:25	105:12,15,17	sample 70:15	89:21 90:6
19:23	request 104:18	Riverside 29:6	71:13	91:8,18 102:6
Registers 10:14	109:14	29:10,12	Saturday 11:14	104:22
regular 58:22	requested	road 90:7	28:4	seek 100:10

seen 17:23 18:6 18:7 19:7,13 19:19 48:15,18 51:5 67:22	sign 9:3 52:4 signature 48:21 48:23 49:12,15 51:25	splitting 29:23 30:5 31:2	44:15,21,24 45:21 57:6 59:4 63:2 71:5 71:11,12 76:5	4:3 112:22 114:6
sentence 54:17 54:25 55:19,25 63:24	signed 3:14,16 49:18,23 50:8 50:13	spoken 13:15 sprained 66:3 Stamford 38:10	76:19,20 80:23 81:5,8,12,19 86:4,7,8,18 87:21,22 88:19 88:19 90:6,24 91:2,7 96:19	Syed 1:12 23:17 24:22 30:3,4,7 30:9 32:15 37:8 46:15 55:9 57:22,24 83:17,19 92:18 92:21 94:8 97:2 99:22 108:5,7,14 110:13
separate 59:13 103:12,16	significantly 58:20	start 33:14 34:21 41:9,11,14,16 41:18,20 62:2 62:13 93:4 111:9	store 25:23 street 1:21 2:6 2:12 4:12 42:17,19 43:4 43:14,20,24,25 44:3,10,12 45:17 46:18 52:19,21,22 54:5 58:16 60:2 62:23 63:9,15 73:8 110:19,20	Syed's 110:23
September 17:22 19:12,18	similar 4:20 38:14	started 22:25 23:2 25:20,22 26:22,24 27:6 27:7 29:2 30:4 30:16 34:3 36:3 39:10,11 42:24 45:18 46:22 47:3,6 47:11 62:3,4 72:22	structure 11:25 40:7	T
series 4:22	Similarly 1:6	State 1:23 4:4,8 4:10	Subscribed 112:22	T 3:1,1 4:2 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1
Services 1:10 21:8,11,17,21	simplicity 21:18	statement 58:25 Staten 45:10 96:13	sugar 5:25 Suite 1:21 2:6,12 sum 102:6 Summer 22:21 22:24 Sunday 11:14 28:5 Sundays 9:16,22 11:4 supervised 63:22 64:11 support 67:20 supposed 21:4 24:17 79:8,9 79:15 sure 5:14 69:19 80:3 83:6 86:23 90:10 surgery 66:6 switching 44:11 sworn 3:14,17	
set 67:19 74:10 75:18 114:19	simply 59:23	starting 87:3,9 100:20		
seven 91:4	sister 17:13 54:6 64:4	states 1:2 40:4 44:25		
seventeen 86:4,6 86:8 87:22	sit 99:19	stenographica... 114:8		
sheet 76:23 115:1	Situated 1:6	STIPULATED 3:3,8,13		
short 92:11	situation 98:17 98:22	stop 28:8 31:22 57:2,10,11 63:7 72:2,6,13 75:10 78:15,17 78:25 79:18 80:8 93:5,6,23		
show 17:19 24:10,11,12 32:2,6,10,23 33:5,18,19 34:21 35:2 48:10 60:17,21 62:8,11 64:25 65:22,23 67:15	six 76:25 91:4	stopped 28:16 29:12 99:9		
showed 33:8 60:23	sixteen 86:11,18	stops 24:13 31:16,20 34:17 34:25 35:14,15 36:5,8,13 40:3 40:9,10,11		
showing 19:4,10 19:16 51:3 54:20 60:10 101:16	sixty 12:3 59:10			
shows 89:20	skip 84:20,21			
sick 65:11,12,13 65:15,19	snack 99:16			
Siegel 42:19 43:4,14,20,24 43:25 44:3,10 44:12 45:17 46:18 58:16 60:2,5,6 62:23 63:9 73:8 110:19,20	soft 13:14			
	somebody 23:19			
	sorry 11:7 15:10 33:3 77:14 78:11			
	sort 12:15 38:22 43:16 59:14			
	sound 42:25			
	Sounds 43:2			
	source 100:15			
	SOUTHERN 1:2			
	speak 7:9,12 69:6 88:5			
	speaking 5:13			
	specific 13:9 58:14			
	specifically 83:6			
	spell 12:12			
	spent 103:23			
	split 26:22 30:20 33:24			

100:1 101:1	testified 4:5	tie 31:8 59:22	62:5 65:18	twenty-one
102:1 103:1	110:8 111:13	ties 38:23 43:16	98:16,24 99:4	87:19,19,21
104:1 105:1	111:19 112:9	59:13 64:14	100:21 111:19	twenty-six 16:6
106:1 107:1	testimony 102:8	time 3:10 5:14	today 5:23 6:10	twenty-three
108:1 109:1	111:23 114:7,8	21:3,6 22:2	6:13,20 7:2,2,3	81:6,9
110:1 111:1	text 32:13 33:4	23:14 24:15	17:23 19:8,14	two 39:8 52:9,11
112:1 113:7	108:4,7,10,14	27:5,11,14	19:19 48:16,19	53:4,4 73:5,5
114:1,1	Thank 112:15	28:14,19 29:4	51:6 67:22	75:8 76:25
take 5:13,16,17	thing 28:2 64:12	29:9,14 30:4	110:8	79:14 82:3
8:14 24:11	81:17	30:16 31:9,13	today's 6:23	89:23 90:3
25:9,10 33:21	things 20:2	31:15,17 32:2	7:10 51:16,19	91:4,14,19
45:25 58:7	59:17 108:9	33:5,9,10,22	told 24:25 25:7	96:19 103:15
65:5,11,12	111:6	34:4,19 35:11	25:11,11 26:17	two-minute 46:2
68:4,10,13,18	think 6:2,11	35:21,23 36:3	50:22 89:15	type 9:3 47:24
70:12 71:10	10:9 14:18,18	36:7,17 37:17	tolls 100:14	106:25
82:17 92:10	23:24 25:5	37:22 38:4,19	102:3,3,7,14	typical 63:22
95:14 99:6,8	26:8 29:10,13	38:21 39:13,14	103:7,8,12,17	64:10
99:10	30:22 35:5	40:13,20 43:7	103:19,24	typically 32:20
taken 1:18 21:25	40:13 41:8	43:8,11,23	top 101:21,22	111:4
46:4 66:2,4	42:4 43:22	46:5 47:16,21	102:21	
67:13 95:16	45:8 46:21	47:21 50:15,19	total 56:16	<hr/> U <hr/>
100:25 101:3	52:15 54:2,4,4	50:21 53:11,24	towns 45:8	U 3:1
114:8	54:5 57:12	54:8 57:9,10	traffic 36:20	Uh-huh 15:8
takes 98:19	60:11 65:4	57:14,25 60:10	40:23 44:7	80:14 83:3
talk 104:25	66:11,12,17	60:11 64:21	train 23:19,21	89:7
talking 9:17	69:5 73:17,17	65:21 66:3,11	24:2	understand 4:25
106:18	73:18 76:17,18	67:14 68:10,13	trained 24:4	5:5,18 18:15
tax 104:3,13,18	79:4,7,13	68:19 70:20,24	transcribed	18:19,22 21:19
105:6,11,19,20	80:22,22 81:4	71:9,10,19,22	114:9	50:7,12,17
106:6,11	81:7,18 83:25	72:6,8,12,13	transcript	90:12 105:9
113:23	84:3 86:17	73:9,15,18,19	114:11	understanding
taxes 100:23,25	88:13,18,18	75:13 76:7,10	trial 1:17 3:11	20:8 22:13
tell 30:9 45:24	90:5 91:14	77:3 78:9,12	114:4,12	49:25 51:8
48:15 61:9	93:23 104:14	78:20 79:20	true 114:11	UNITED 1:2
65:24 68:15	106:13,15	80:11,18 83:8	truthfully 6:9,13	Upstairs 110:22
83:19 92:21	third 51:25	83:12 84:25	6:19	use 66:7
94:8,10,16,21	55:19	85:9 92:25	try 5:4 13:11,15	usually 93:4,16
94:24 98:11,24	thirty 36:16,19	95:17 96:4,11	trying 91:17	93:17 111:9
99:22,25	40:14	99:6 100:5,11	97:22 105:10	
telling 50:4	thirty-five 36:16	103:22 107:23	Turning 54:11	<hr/> V <hr/>
tells 8:22	44:19	108:15 112:17	twelfth 15:4,6	vacation 65:5,10
ten 12:21 77:2	thirty-two 81:20	times 10:15 32:4	twenty 36:14	van 66:22,22,24
91:5,5	Thomas 52:15	34:20 35:12	44:8	varied 40:17
Teresa 1:4,18	52:17,18	37:9,18 56:22	twenty-five	varies 33:20
4:9 5:7 112:20	three 52:10 53:4	56:24 57:2,4,5	36:14 44:19	34:7 36:11
113:4 114:4	67:3 76:25	57:23 58:22	twenty-nine	41:12 45:5
term 21:16	83:4 91:4,19	59:21 60:2,25	80:24 81:6,8	61:16,20 62:16

63:13	we'll 90:11	written 55:12,13	\$0.30 12:3	96:2
vary 10:11	104:25	55:15	\$0.35 14:23	13 17:21 18:5
verbally 5:15	we're 9:17 41:21		\$0.40 12:4	14 76:3
55:11,14	62:23 74:13	X	\$0.53 31:22	16 77:20 78:6
version 18:7,9	75:22 84:8	x 1:3,15 113:1,7	\$28,890 103:8	79:19 91:24
voice 5:20 8:14	we've 92:12	Y	\$64,300 102:6	17 19:12,18 80:9
13:12,15	whatever's 31:7		\$9 14:15	18 113:10
Voluck 1:20	37:16	Yale 2:13 5:8	0	190 10:25
2:11	What'd 12:16	104:24 113:4		1987 15:10
W	24:23 25:6	yeah 12:7,23	003469 69:12	2
wage 8:6 14:16	WHEREOF	27:19 49:6	003479 69:13	2 1:22
14:18	114:19	54:5 57:8	003482 70:13	2nd 114:5,20
wages 18:24	WHITE 1:4	59:24 61:5	003487 76:13	2:00 9:15,16,17
19:2 51:13	William 1:21	62:19 63:16	003488 77:19	9:20,21 28:3,4
wait 5:7,11 6:8	2:12	70:5 71:2	003489 77:19	28:4 61:25
73:11 90:9,9,9	Williams 1:4	78:14 86:22	003490 78:7	62:3,4
waived 3:6	39:20	89:15 94:2,14	055611-0002	2:25 78:14,14
want 34:4 55:8	Windstar 66:24	97:10 99:15	2:14	79:22
68:5 74:10	withheld 100:23	107:7	06511 4:13	2:40 75:14,15
84:19,21 87:13	witness 4:2 5:10	year 15:9 16:5	1	2:42 78:21,23
104:22	5:22 13:13,16	42:7,8,15	1:00 62:8	20 17:22
wanted 26:22	49:4 52:17,20	46:25 101:25	1:14 96:13	200 2:6 11:13
warrant 10:17	68:24 90:14	103:4 105:13	1:42 79:16	2000 15:10
10:18	92:14 105:3	105:20,21	1:48 1:23	2007 22:22 65:9
wasn't 28:25	113:3 114:6,13	106:23,24	1:52 77:6	65:13 66:10
29:17 58:15	114:19	years 15:21 16:9	10 49:19 89:20	100:16 104:3
59:16 64:13	work 9:11 12:24	52:9,10 53:4,4	10th 49:20	104:19 105:23
94:11 95:11,13	13:24 20:15	53:5	10:00 41:20	113:23
way 93:5,19 95:2	22:14,14,17	Yonkers 15:14	62:16,18	2008 42:9 104:5
weather 37:16	25:20 27:24	53:15,18	10:19 71:23 72:3	2009 42:10,16
98:17,19	28:8,12 29:5	York 1:2,21,22	72:19,23	47:2 104:7
week 9:12 33:17	29:19 53:7,25	1:24 2:7,7,12	10:20 80:12	2010 42:16 47:2
33:19 39:8	54:8 59:7	2:12 4:4 10:15	10:28 76:9	49:19 71:3,17
58:20 59:3,9	65:22 93:5,19	10:15 15:14	100 1:21 2:12	73:10,18 74:18
82:22 83:4	100:17 104:25	27:4,17 30:23	10019 2:7	75:11 76:3
103:18	111:25	31:3,14 33:23	10038 1:22 2:12	77:20 78:6
weekly 103:14	worked 13:20	36:4,6 40:6	101 113:15,16,17	79:19 80:9
went 45:13 84:4	32:20 58:19	44:20,22 45:9	104 113:23	86:2 91:24
96:18,25 97:4	67:20 100:19	45:10,22 53:15	1099 101:4,5,7	96:2 101:7,10
97:5,13,17,19	working 25:14	YS 1:11,12	101:10,13,19	101:25 104:9
98:7,25 105:20	26:14 27:13	Z	103:3 106:5	113:15,16
111:10 112:3	36:22 39:12,16	Zaimi 1:13	113:15,16,17	2011 22:24 65:9
weren't 19:3	wouldn't 46:16	107:15,17	11 50:7,9	89:18,20 90:19
West 2:6	46:17 56:13,15	\$	110 113:5	100:16 101:13
Westchester	97:6 100:4		112 113:4	103:5 104:11
27:3	109:14	\$0.12 10:9,18	12 1:8 53:17	104:19 113:17
	writing 84:15	\$0.15 10:9,18		

113:23	3755 87:3,11	33:7,19 34:13
2012 13:2,3	3769 87:25 88:2	34:16,21 35:3
108:21	377 90:8	35:11,24 40:25
2013 1:22 8:2	3775 88:9 89:20	41:4,9 42:3
12:8,9 13:2,4,8	3776 88:9,15	60:7,12,17
17:22 19:12,18	90:2 91:9	63:5
52:5 112:23	3777 88:15	6:30 60:12,17
114:6,20	89:17 91:11	61:4,18
21 4:12	3782 92:15	67 113:14
215 1:21 2:12	3783 92:15	69 69:13,14
23 74:18 75:11	93:25 94:2	
24 71:3,17 73:10	3854 95:24	7
240 11:5	3855 95:22,24	7 63:17
25 52:5		7:00 41:14 61:18
250 10:25 11:5	4	782 49:17
28 86:2	4 19:11 113:4	
	4:00 63:2	8
3	4:09 80:19	8:00 9:16,21
3 4:12 54:11,13	4:42 112:17	28:4 41:16
54:14	4339 1:8	8:06 96:6
3/15/88 16:25	48 18:3 19:6	8:12 92:4
3:00 32:7,11	113:10,11	8:48 78:11
33:7,8,13,15	49 48:8,12	826 52:15,16
33:16,18 34:9	113:11	87 15:10
34:10,15,22		
35:11,22 40:25	5	9
41:4,7 60:7	5 19:17	9 89:18 90:17
62:25	5:00 34:13,16	113:22
3:25 72:14 73:25	35:24 63:5	9:00 41:18 62:16
3:54 92:9	50 50:25 51:4	62:18
3469 69:13	54:12 63:18	9:21 74:21,25
3482 70:9 72:5	113:13,13	900 2:6
3487 76:16	500 11:15	
3491 80:7	51 67:11,16 74:9	
3494 81:23	113:14	
3495 81:25	52 101:8,17	
3497 82:4 84:8	102:20,21	
3498 84:10	113:15	
3499 84:13	53 101:11	
35 90:7	102:18 113:16	
3500 84:15	54 101:14	
3723 85:15	102:23 113:17	
3729 85:17	57th 2:6	
3752 85:20,25		
86:6,21	6	
3753 85:23,25	6 58:18	
86:10	6:00 9:15,20	
	28:3 32:9,11	